



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: May 27, 2009
RE: Huhtamaki Foodservice / 089 - 18532 - 00228
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

**Huhtamaki Foodservice, Inc.
6629 Indianapolis Boulevard
Hammond, Indiana 46320**

(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.: T089-18532-00228	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 27, 2009 Expiration Date: May 27, 2014

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). 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 stationary, molded pulp paper manufacturing plant.

Source Address: 6629 Indianapolis Boulevard, Hammond, IN 46320
 Mailing Address: (same as above)
 General Source Phone Number: (219)844-8950
 SIC Code: 2679 Paper and Allied Products
 County Location: Lake
 Source Location Status: Attainment/Unclassifiable for PM10, SO₂, CO, NO_x and Lead, Nonattainment for PM2.5 and 8-hour ozone, Part 70 Permit Program
 Source Status: Minor Source, under PSD Rules & Nonattainment NSR
 Major Source, under Emission Offset 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:

EMISSION UNIT	CONST DATE	STACK/VENT ID	FACILITY	POLLUTION CONTROL DEVICE	MAXIMUM PRODUCTION RATE (tons/hr)	MAXIMUM HEAT INPUT CAPACITY (MMBtu/hr)
001	1947	1A, 1B & 1C	Molded Pulp Dryer No. 1	N/A	0.532	5.43
002	1947	2A, 2B & 2C	Molded Pulp Dryer No. 2	N/A	0.532	5.43
003	1947	3A, 3B & 3C	Molded Pulp Dryer No. 3	N/A	0.627	6.4
004	1947	4A, 4B, 4C	Molded Pulp Dryer No. 4	N/A	0.627	6.4
005	1947	5A, 5B & 5C	Molded Pulp Dryer No. 5	N/A	0.532	5.43
006	1947	6A, 6B & 6C	Molded Pulp Dryer No. 6	N/A	0.532	5.43
008	1947	8A, 8B, 8C & 8D	Molded Pulp Dryer No. 8	N/A	1.127	11.50
009	1947	9A, 9B, 9C & 9D	Molded Pulp Dryer No. 9	N/A	1.127	11.50
010	1947	10A, 10B, 10C & 10D	Molded Pulp Dryer No. 10	N/A	1.127	11.50
011	1947	11	Babcock & Wilcox Boiler	N/A	N/A	23

- 1) Nine (9) Molded Pulp Dryers No. 1 - 6 & 8 - 10, identified as Units 001 – 006 and 008 – 010, each constructed in 1947 and utilizing natural gas:
 - (a) Four (4) Molded Pulp Dryers No. 1, No. 2, No. 5 and No. 6, each with a maximum production

rate of 0.532 tons/hr and a heat input capacity of 5.43 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

- (b) Two (2) Molded Pulp Dryers No. 3 and No. 4, each with a maximum production rate of 0.627 tons/hr and a heat input capacity of 6.4 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 3A, 3B & 3C and 4A, 4B & 4C, respectively. There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.
 - (c) Three (3) Molded Pulp Dryers No. 8, No. 9 and No. 10, each with a maximum production rate of 1.127 tons/hr and a heat input capacity of 11.50 MMBtu/hr. Each dryer exhausts through four (4) separate stacks, identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.
- 2) One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, installed in 1947, natural gas-fired only, with a maximum design capacity of 23 MMBtu/hr and exhausting to Stack 11.

There is no pollution control equipment associated with any of these facilities.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have any applicable requirements.

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 it is a major source, as defined in 326 IAC 2-7-1(22).

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, T089-18532-00228, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief

formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement 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 Northwest 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;

IDEM

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865, or

Northwest Regional Office

Telephone Number: 219-757-0265
Facsimile Number: 219-757-0267

- (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 and Enforcement 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 T089-18532-00228 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 and Enforcement Branch, 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 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
Permit Administration and Support Section, 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]

- (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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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.

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
Permit Administration and Support Section, 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 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 twenty percent (20%) 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6.8-10-3]

The Permittee shall be in violation of 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed 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 and Enforcement Branch, 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 sixty (60) 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 sixty (60) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement 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 sixty (60) 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.

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

C.11 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 July 22, 1988.
- (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.12 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.13 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;
 - (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.14 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.15 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), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2007 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) 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).

- (c) 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) affecting an existing emissions unit other than a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 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 and Enforcement Branch, 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.18 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 FACILITY OPERATION CONDITIONS

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

Nine (9) Molded Pulp Dryers No. 1 – 6 & 8 – 10, identified as Units 001 – 006 and 008 - 010, each constructed in 1947 and utilizing natural gas:

- (a) Four (4) Molded Pulp Dryers No. 1, No. 2, No. 5 and No. 6, each with a maximum production rate of 0.532 tons/hr and a heat input capacity of 5.43 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.
- (b) Two (2) Molded Pulp Dryers No. 3 and No. 4, each with a maximum production rate of 0.627 tons/hr and a heat input capacity of 6.4 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively. There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.
- (c) Three (3) Molded Pulp Dryers No. 8, No. 9 and No. 10, each with a maximum production rate of 1.127 tons/hr and a heat input capacity of 11.50 MMBtu/hr. Each dryer exhausts through four (4) separate stacks, identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and 10A, 10B, 10C & 10D, respectively.

(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 Particulate Matter less than 10 microns (PM10) [326 IAC 6.8-2-34]

Pursuant to 326 IAC 6.8-2-34 (formerly 326 IAC 6-1-10.1) (Lake County PM10 emission requirements for Huhtamaki Foodservice, Inc.), the PM10 emissions related to each facility listed below shall not exceed the following allowable PM10 emission rates:

Emission Unit	EMISSION LIMIT	
	lbs/ton	lb/hr
Molded pulp dryer number 1	0.546	0.210
Molded pulp dryer number 2	0.546	0.250
Molded pulp dryer number 3	0.546	0.290
Molded pulp dryer number 4	0.546	0.290
Molded pulp dryer number 5	0.546	0.130
Molded pulp dryer number 6	0.546	0.130
Molded pulp dryer number 8	0.546	0.350
Molded pulp dryer number 9	0.546	0.410
Molded pulp dryer number 10	0.546	0.350

D.1.2 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.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five (5) years from the last valid compliance test or by August 30, 2011, the Permittee shall perform PM10 testing utilizing Methods 201 or 201A or other methods as approved by the Commissioner on at least one (1) of the largest, most frequently used Molded Pulp Dryers utilizing the worst case chemical additive/dye to demonstrate compliance with Condition D.1.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes only the filterable portion. In addition to this requirement, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Monitoring of Dry-Lbs/Month Produced

In order to comply with Condition D.1.1, the Permittee shall limit the dry-lbs per month of molded pulp products produced for each of the nine (9) Molded Pulp Dryers No. 1 – 6 and 8 – 10 as follows:

FACILITY	MAXIMUM PRODUCTION dry-lbs/month
Molded Pulp Dryer No. 1	792,141
Molded Pulp Dryer No. 2	792,141
Molded Pulp Dryer No. 3	933,647
Molded Pulp Dryer No. 4	933,647
Molded Pulp Dryer No. 5	792,141
Molded Pulp Dryer No. 6	792,141
Molded Pulp Dryer No. 8	1,677,647
Molded Pulp Dryer No. 9	1,677,647
Molded Pulp Dryer No. 10	1,677,647

D.1.5 Natural Gas

In order to comply with Condition D.1.1, the source shall burn only natural gas.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the Molded Pulp Dryers Nos. 1 – 6 and 8 -10 stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C-Response to Excursions or Exceedances. 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the total quantity of dry-lbs/month of molded pulp products produced for each Molded Pulp Dryer No. 1 – 6 and 8 – 10.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of each Molded Pulp Dryer stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, installed in 1947, natural gas-fired only, with a maximum design capacity of 23 MMBtu/hr and exhausting to Stack 11.

(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 Particulate Matter less than 10 microns (PM10) [326 IAC 6.8-2-34]

Pursuant to 326 IAC 6.8-2-34 (formerly 326 IAC 6-1-10.1) (Lake County PM10 emission requirements), the PM10 emissions from the Babcock and Wilcox Type FM Boiler shall be limited to less than 0.007 lbs/MMBtu and 0.050 lbs/hr.

D.2.2 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.

Compliance Determination Requirements

D.2.3 Natural Gas

In order to comply with Condition D.2.1, the source shall burn only natural gas.

SECTION D.3 FACILITY OPERATION CONDITIONS – Insignificant Activities

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

One (1) Cold Cleaner Degreaser, solvent not remotely stored.

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3]

- (a) Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), users of solvents for use in cold cleaner degreaser operations located in Clark, Floyd, Lake, and Porter Counties shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty degrees Celsius (20 °C) (sixty-eight degrees Fahrenheit (68 °F)).
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following 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.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] [326 IAC 8-3-5]

Compliance with the solvent vapor pressure limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(h) or obtaining from the manufacturer copies of the Material Safety Data Sheets (MSDS).

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

D.3.3 Record Keeping Requirements [326 IAC 8-3-8(d)(2) and (e)]

- (a) To document compliance with Condition D.3.1(a), the Permittee shall maintain each of the following records for each purchase:
- (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) All records required by Condition D.3.3(a) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: **Huhtamaki Foodservice, Inc.**
Source Address: 6629 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: **T089-18532-00228**

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 AND ENFORCEMENT 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: **Huhtamaki Foodservice, Inc.**
Source Address: 6629 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: **T089-18532-00228**

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) and the Northwest Regional Office, within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for IDEM Compliance Section) and (219-757-0265, for Northwest Regional Office); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865, IDEM and 219-757-0267, Northwest Regional Office), 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 AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: **Huhtamaki Foodservice, Inc.**
 Source Address: 6629 Indianapolis Boulevard, Hammond, Indiana 46320
 Mailing Address: (same)
 Part 70 Permit No.: **T089-18532-0228**
 Facility: Nine (9) Molded Pulp Dryers No. 1 – 6 and 8 - 10
 Parameter: Dry-Lbs/Month of Molded Pulp Products Produced
 Limit: See Section D.1.4 Monitoring of Dry-Lbs/Month Produced
 Month: _____ to _____ Year: _____

MACHINE	TOTAL DRY-LBS/MONTH	GAS USAGE (cu.ft.)	STACK OBSERVATION		
			DATE	OBSERVATION (N=Normal & AB=Abnormal)	COMMENTS
1			1		
2			2		
3			3		
4			4		
5			5		
6			6		
8			7		
9			8		
10			9		
TOTAL			10		
			11		
			12		
			13		
			14		
			15		
			16		
			17		
			18		
			19		
			20		
			21		
			22		
			23		
			24		
			25		
			26		
			27		
			28		
			29		
			30		
			31		

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: **Huhtamaki Foodservice, Inc.**
 Source Address: 6629 Indianapolis Boulevard
 Mailing Address: (same)
 Part 70 Permit No.: **T089-18532-00228**

Months: _____ to _____ Year: _____

Page 1 of 2

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**

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

Source Background and Description

Source Name:	Huhtamaki Foodservice, Inc. (formerly The Chinnet Company & Keyes Fibre)
Source Location:	6629 Indianapolis Boulevard Hammond, Indiana 46320
County:	Lake
SIC Code:	2679 - Paper and Allied Products
Permit Renewal No.:	T089-18532-00228
Permit Reviewer:	Debra Malone, HDEM

The Office of Air Quality (OAQ) and Hammond Department of Environmental Management (HDEM) have reviewed a Part 70 Operating Permit Renewal application from Huhtamaki Foodservice, Inc. relating to the operation of a Molded Pulp Paper Manufacturing Plant.

History

On February 2, 2004, Huhtamaki Foodservice, Inc. submitted applications to the OAQ and the HDEM requesting to renew its operating permit. Huhtamaki Foodservice, Inc. was issued a Part 70 Operating Permit on December 1, 1999.

Permitted Emission Units and Pollution Control Equipment

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

EMISSION UNIT	CONST DATE	STACK/VENT ID	FACILITY	POLLUTION CONTROL DEVICE	MAXIMUM PRODUCTION RATE (tons/hr)	MAXIMUM HEAT INPUT CAPACITY (MMBtu/hr)
001	1947	1A, 1B & 1C	Molded Pulp Dryer No. 1	N/A	0.532	5.43
002	1947	2A, 2B & 2C	Molded Pulp Dryer No. 2	N/A	0.532	5.43
003	1947	3A, 3B & 3C	Molded Pulp Dryer No. 3	N/A	0.627	6.4
004	1947	4A, 4B, 4C	Molded Pulp Dryer No. 4	N/A	0.627	6.4
005	1947	5A, 5B & 5C	Molded Pulp Dryer No. 5	N/A	0.532	5.43
006	1947	6A, 6B & 6C	Molded Pulp Dryer No. 6	N/A	0.532	5.43
008	1947	8A, 8B, 8C & 8D	Molded Pulp Dryer No. 8	N/A	1.127	11.50
009	1947	9A, 9B, 9C & 9D	Molded Pulp Dryer No. 9	N/A	1.127	11.50
010	1947	10A, 10B, 10C & 10D	Molded Pulp Dryer No. 10	N/A	1.127	11.50
011	1947	11	Babcock & Wilcox Boiler	N/A	N/A	23

- 1) Nine (9) Molded Pulp Dryers No. 1 - 6 & 8 - 10, identified as Units 001 – 006 and 008 - 010, each constructed in 1947 and utilizing natural gas:
 - (a) Four (4) Molded Pulp Dryers No. 1, No. 2, No. 5 and No. 6, each with a maximum production rate of 0.532 tons/hr and a heat input capacity of 5.43 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.
 - (b) Two (2) Molded Pulp Dryers No. 3 and No. 4, each with a maximum production rate of 0.627 tons/hr and a heat input capacity of 6.4 MMBtu/hr. Each dryer exhausts through three (3) separate stacks, identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively. There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.
 - (c) Three (3) Molded Pulp Dryers No. 8, No. 9 and No. 10, each with a maximum production rate of 1.127 tons/hr and a heat input capacity of 11.50 MMBtu/hr. Each dryer exhausts through four (4) separate stacks, identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.
- 2) One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, installed in 1947, natural gas-fired only, with a maximum design capacity of 23 MMBtu/hr and exhausting to Stack 11.

There is no pollution control equipment associated with any of these facilities.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

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

Insignificant Activities

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

- (1) Space heaters, process heaters, or boilers using the following fuels:
 - (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (4) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (8) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (9) Other emergency equipment as follows:
Stationary fire pumps.
- (10) Two (2) electric laminators following Molded Pulp Dryer No. 4.

Process Description

The source manufactures various types of molded pulp products. These products, such as cup carriers, super packets, berry baskets, fruit protectors, citrus packs, and tube packs, are produced from pre- and post-consumer newsprint paper.

To produce these products, secondary fiber, water, and sizing chemicals are mixed to form a pulp slurry solution in one of the nine (9) molded pulp drying machines at the plant. This slurry solution is approximately 94 to 97 percent water and the remaining percentage is fiber. The slurry solution is then vacuum-formed into various types of product molds, and then the rough molded product proceeds through a drying oven. During this process, the water is removed from the molded product (10 percent is retained in the product) and the finished product is produced.

Molded Pulp Drying Machines

To produce the various types of molded paper products at the Hammond plant, the plant is equipped with nine (9) molded pulp drying machines. Each machine is equipped with a pulp slurry station, a molding station, drying oven, and product output station. The vacuum-formed pulp manufacturing process consists of taking water and sizing chemicals, including polymers (sizing agents) for the purpose of forming a water penetration barrier and dyes which add color to the paper product, and mixing these with secondary fiber to make pulp. After the pulp is blended, it is vacuum-formed on wire molds after which the wet molded products are dried in ovens. This entire process is performed within each pulp molding/drying machine.

The output of each molding machine is referred to as molded tons, while the finished product is referred to as sealed tons or packed tons. When the finished product does not meet product standards, the material is referred to as broke tons. A majority of the broke tons is recycled. Of this amount, about 30 percent is wet-broke, never having passed through the dryers. Associated with the molded pulp/drying machines are natural gas-fired burners which are used to supply heat to the dryer portion of the machines.

During the production of molded pulp products, several types of additives (chemicals/dyes) are mixed with the used newsprint and water. The chemicals used include coagulants, retention aids, defoamers, paper sizing agents, cationic polymers, surfactants, debonding agents and microbiocides (See Chemical Additives and Dyes). Each of these chemicals is intended to perform a specific function in the production of the molded pulp products.

Babcock and Wilcox Boiler

To provide heat to the Hammond plant, the plant is equipped with a Babcock and Wilcox Type FM Boiler. This boiler is designed to combust natural gas, and has a maximum rated heat input capacity of 23 MMBtu/hr.

Chemical Additives and Dyes

Chemical additives and dyes used in the Molded Pulp Papermaking Process are as follows:

- 1) Nalco 131-DR (Nalco Chemical Company)
- 2) Nalco 7511 (Nalco Chemical Company)
- 3) Nalco 7530 (Nalco Chemical Company)
- 4) Nalco 7541 (Nalco Chemical Company)
- 5) Nalco 7542 (Nalco Chemical Company)
- 6) Nalco 7583 (Nalco Chemical Company)
- 7) Nalco 7634 (Nalco Chemical Company)
- 8) Nalco 7648 (Nalco Chemical Company)
- 9) Nalco 7611 (Nalco Chemical Company)
- 10) Nalco Stabrex ST100 (Nalco Chemical Company)
- 11) Nalco 7647 (Nalco Chemical Company)
- 12) Pontamine Fast Red (Bayer Corporation)
- 13) Pontamine Kraft Orange A Liquid (Miles, Incorporated) /
Fastusol Brown PR443L (BASF Corporation)
- 14) Basazol Green PR951 (BASF Corporation, Chemical Division)
- 15) Basazol Violet 49L (BASF Corporation, Chemical Division)
- 16) Nalco 62010 (Nalco Chemical Company)
- 17) Nalco 64114
- 18) Nalco BP600
- 19) Ultra Positek 8692 (Nalco Company)

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Title V OP T089-9029-00228, issued on December 1, 1999;
- (b) AA 089-15135-00228, issued on November 14, 2001;
- (c) Permit Reopening 089-13362-00228, issued on April 25, 2002;
- (d) Second AA 089-17277-00228, issued on March 19, 2003; and
- (e) Third AA 089-18713-00228, issued on March 12, 2004.

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.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1A	Molded Pulp Dryer No. 1	44	1.76	3100	250
1B	Molded Pulp Dryer No. 1	50	1.47	2500	290
1C	Molded Pulp Dryer No. 1	49	1.51	3200	185
2A	Molded Pulp Dryer No. 2	45	1.76	3100	250
2B	Molded Pulp Dryer No. 2	48	1.25	2500	290
2C	Molded Pulp Dryer No. 2	44	2.10	3200	185
3A	Molded Pulp Dryer No. 3	45	1.75	3100	250
3B	Molded Pulp Dryer No. 3	50	1.47	2500	290
3C	Molded Pulp Dryer No. 3	48	2.17	3200	185
4A	Molded Pulp Dryer No. 4	45	1.75	3100	290
4B	Molded Pulp Dryer No. 4	50	1.47	2500	290
4C	Molded Pulp Dryer No. 4	48	2.17	3200	185
5A	Molded Pulp Dryer No. 5	44	1.75	3100	235
5B	Molded Pulp Dryer No. 5	51	1.47	3000	235
5C	Molded Pulp Dryer No. 5	45	2.17	3000	180
6A	Molded Pulp Dryer No. 6	58	2.34	3100	235
6B	Molded Pulp Dryer No. 6	50	2.05	3000	235
6C	Molded Pulp Dryer No. 6	49	2.26	3000	180
8A	Molded Pulp Dryer No. 8	46	1.91	2600	230
8B	Molded Pulp Dryer No. 8	50	1.72	2300	340
8C	Molded Pulp Dryer No. 8	50	1.71	3700	180
8D	Molded Pulp Dryer No. 8	48	1.92	15000	180
9A	Molded Pulp Dryer No. 9	46	1.92	2600	230
9B	Molded Pulp Dryer No. 9	51	1.72	2300	340
9C	Molded Pulp Dryer No. 9	50	1.71	3700	180
9D	Molded Pulp Dryer No. 9	50	2.57	15000	180
10A	Molded Pulp Dryer No. 10	46	1.92	2600	230
10B	Molded Pulp Dryer No. 10	50	1.71	2300	340
10C	Molded Pulp Dryer No. 10	50	1.71	3700	180
10D	Molded Pulp Dryer No. 10	48	1.92	15000	180
11	Babcock & Wilcox Boiler	4	3	127	429

Emission Calculations

See Appendix A of this document for detailed emission calculations. These calculations were derived from the Company's 2006 emission statement (pages 1 through 11).

County Attainment Status

The following attainment status designations are applicable to Lake County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(a) Ozone Standards

- (1) 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.
- (2) 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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air Quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating

the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section

(b) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Lake County has been classified as attainment or unclassifiable in Indiana for particulates less than ten (10) microns in diameter (PM₁₀), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	65.47
PM ₁₀	16.37
PM _{2.5}	16.37
SO ₂	0.24
VOC	131.99
CO	33.73
NO _x	40.16

HAPs	tons/year
Acetaldehyde	0.02
Formaldehyde	0.02
Hydrochloric Acid	0.07
Mercury Compounds	0.0000111
Methanol	1.58
Methyl Chloroform	0.004
Toluene	0.03
Total	1.72

- (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 2006 emission data.

Pollutant	Actual Emissions (tons/year)
PM	2.65
PM ₁₀	0.66
SO ₂	0.10
VOC	42.99
CO	13.90
NO _x	16.55

Pollutant	Actual Emissions (tons/year)
Acetaldehyde	0.02
Formaldehyde	0.02
Hydrochloric Acid	0.07
Mercury Compounds	0.0000111
Methanol	1.58
Methyl Chloroform	0.004
Toluene	0.03
TOTAL	1.72

Part 70 Permit Conditions

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

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume 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	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Molded Pulp Dryer No. 1	5.09	0.92	0.92	0.01	10.34	1.98	2.30	Negligible
Molded Pulp Dryer No. 2	5.09	1.10	1.10	0.01	10.34	1.98	2.30	Negligible
Molded Pulp Dryer No. 3	6.00	1.27	1.27	0.02	12.19	2.33	2.71	Negligible
Molded Pulp Dryer No. 4	6.00	1.27	1.27	0.02	12.19	2.33	2.71	Negligible
Molded Pulp Dryer No. 5	5.09	0.57	0.57	0.01	10.34	1.98	2.30	Negligible
Molded Pulp Dryer No. 6	5.09	0.57	0.57	0.01	10.34	1.98	2.30	Negligible
Molded Pulp Dryer No. 8	10.79	1.53	1.53	0.03	21.90	4.51	5.26	Negligible
Molded Pulp Dryer No. 9	10.79	1.80	1.80	0.03	21.90	4.51	5.26	Negligible
Molded Pulp Dryer No. 10	10.79	1.53	1.53	0.03	21.90	4.51	5.26	Negligible
Babcock & Wilcox Boiler	0.74	0.22	0.22	0.06	0.54	8.22	9.78	Negligible
Total	65.47	10.78	10.78	0.23	131.98	34.33	40.18	Negligible
Major Source Threshold	250	250	250	250	25	250	100	10 single 25 combined

*Note: Potential to emit emissions from the Molded Pulp Dryers No. 1 – 6 and 8 – 10 are process emissions and combustion emissions combined.

- (a) This existing stationary source is not major for 326 IAC 2-2, PSD because the emissions of each attainment 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) This existing stationary source is major for 326 IAC 2-3, Emission Offset and/or Nonattainment NSR because the emissions of VOC are greater than twenty-five (>25) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets 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.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60.40, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is Commenced After August 17, 1971), Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), or Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for the Babcock & Wilcox Boiler. Construction of this unit commenced in 1947 and it has not been modified or reconstructed since.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 61, 40 CFR Part 63) included in the permit for this source.

The requirements of the National Emission Standards, 326 IAC 20 and 40 CFR Part 63.440, Subpart S (National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry) do not apply to this source because it is not a major source of HAPs as defined in Subpart 63.2 of the subpart A of this part.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 20, (40 CFR 63, Subpart DDDDD Industrial, Commercial, & Institutional Boilers and Process Heaters) do not apply to this source because it is not a major source of HAPs. Additionally, on June 8, 2007, the United States Court of appeals for the District of Columbia Circuit (in NRDC v. EPA, no. 04-1386) vacated in its entirety the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. Also the state rule at 326 IAC 20-95 incorporated the requirements of the NESHAP 40 CFR 63, Subpart DDDDD by reference, the requirements of 326 IAC 20-95 are no longer effective.

State Rule Applicability – Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 6, 1998. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on July 22, 1988. This ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-1.1-5 (Nonattainment NSR)

Lake County has been designated as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Huhtamaki Foodservice, Inc. has a limited potential to emit of 10.78 tpy of PM₁₀, below 100 tpy. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, 326 IAC 2-1.1-5 does not apply.

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

This source, built in 1947, located in Lake County is not a major stationary source for the purposes of 326 IAC 2-2, PSD because the emissions of each attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the 28 listed source categories.

326 IAC 2-3 (Emission Offset)

This source, built in 1947, located in Lake County is an existing major stationary source for the purposes of 326 IAC 2-3, Emission Offset because the emissions of VOC, are greater than twenty-five (>25) tons per year. The source has not been reviewed under the requirements of 326 IAC 2-3 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-3.

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

The operation of the Molded Pulp Paper Manufacturing Plant 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.

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 2007 and every 3 years thereafter. This source which is located in Lake County also has potential to emit greater than or equal to 25 tons of NO_x and VOC; therefore, an emission statement covering the previous calendar year must be submitted by July 1 of any year that the source is not already required to submit a statement if the source emits NO_x or VOC into the ambient air at levels equal to or greater than 25 tpy. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of twenty percent (20%) 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 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to section 2(a) of this rule, this source is subject to the requirements of this rule because it has the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy) and is located in Lake County.

Huhtamaki Foodservice, Inc. and IDEM have determined in permit # 089-9029-00228, issued on December 1, 1999, that it is not technically or economically feasible to install control technology for VOC emissions from these secondary fiber paper machines. The high volumetric flow rates coupled with the fact that the air stream has a very high moisture content, make it not practical and unrealistic to consider a VOC emission capture and control system. U.S. EPA has also determined that Maximum Achievable Control Technology for paper machines is "no add-on controls." As far as a reduction in the use of VOC containing materials, U.S. EPA continues to investigate the viability of chemical substitution that would reduce emissions. Paper products used with food items are subject to FDA requirements which hinder substitution of certain compounds. Over the past five years, Huhtamaki Foodservice, Inc. has eliminated half of the additives and dyes that it previously used. The Company remains open to suggestions on any substitutions that can be made for VOC-containing additives and dyes which will not be in violation of the requirements of the final product.

State Rule Applicability – Individual Facilities

326 IAC 6.8-1-2(a) (Particulate Rules - Non-attainment Area Limitations)

Pursuant to subsection (a) of this rule, all facilities not limited by subsections (b) through (g) or not specifically listed in 326 IAC 6.8-2, PM10 requirements, shall have particulate matter limitations of 0.03 gr/dscf. Each facility is listed in 326 IAC 6.8-2-34; therefore, 326 IAC 6.8-1-2(a) does not apply.

326 IAC 6.8-2-34 (Lake County PM10 emission requirements – Huhtamaki Foodservice, Inc.)

This rule requires that the following facilities located at Huhtamaki Foodservice, Inc. comply with the corresponding PM10 emission limitations as specifically listed in 326 IAC 6.8-2-34 under Huhtamaki Foodservice, Inc.

FACILITY	PM10 EMISSION LIMITATIONS
Molded Pulp Dryer No. 1	0.546 lbs/ton; 0.210 lb/hr
Molded Pulp Dryer No. 2	0.546 lbs/ton; 0.250 lb/hr
Molded Pulp Dryer No. 3	0.546 lbs/ton; 0.290 lb/hr
Molded Pulp Dryer No. 4	0.546 lbs/ton; 0.290 lb/hr
Molded Pulp Dryer No. 5	0.546 lbs/ton; 0.130 lb/hr
Molded Pulp Dryer No. 6	0.546 lbs/ton; 0.130 lb/hr
Molded Pulp Dryer No. 8	0.546 lbs/ton; 0.350 lb/hr
Molded Pulp Dryer No. 9	0.546 lbs/ton; 0.410 lb/hr
Molded Pulp Dryer No. 10	0.546 lbs/ton; 0.350 lb/hr
Babcock and Wilcox Boiler	0.007 lbs/MMBtu; 0.050 lb/hr

326 IAC 7-1.1-1 (Applicability - sulfur dioxide emission limitations)

All emissions units associated with the Molded Pulp Paper Manufacturing Plant have the potential to emit less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7-1.1-1 Lake County sulfur dioxide emission limitations do not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The Cold Cleaner Degreaser without remote solvent reservoirs is subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because it is located in Lake County, existed as of January 1, 1980, and is located at a source that has potential emissions of one hundred (100) tons or greater per year of VOC.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility 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.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility 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.

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), users of solvents for use in cold cleaner degreaser operations located in Clark, Floyd, Lake, and Porter Counties shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight degrees Fahrenheit (68°F)).

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:

(a) The Nine (9) Molded Pulp Dryers No. 1 – 6 and 8 – 10 have applicable compliance determination conditions as specified below:

- (1) Within five (5) years from the last valid compliance test or by August 30, 2011, the Permittee shall perform PM10 testing utilizing Methods 201 or 201A or other methods as approved by the Commissioner on at least one (1) of the largest, most frequently used Molded Pulp Dryers utilizing the worst case chemical additive/dye to demonstrate compliance with Condition D.1.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes only the filterable portion. In addition to this requirement, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol.

This compliance determination condition is necessary to ensure compliance with 326 IAC 6.8-2-34 (Lake County PM10 emission requirements – Huhtamaki Foodservice, Inc.) and 326 IAC 2-7 (Part 70).

- (2) The Permittee shall limit the amount of dry-lbs per month produced for each of the Nine (9) Molded Pulp Dryers No. 1 – 6 and 8 – 10:

FACILITY	MAXIMUM PRODUCTION dry-lbs/month
Molded Pulp Dryer No. 1	792,141
Molded Pulp Dryer No. 2	792,141
Molded Pulp Dryer No. 3	933,647
Molded Pulp Dryer No. 4	933,647
Molded Pulp Dryer No. 5	792,141
Molded Pulp Dryer No. 6	792,141
Molded Pulp Dryer No. 8	1,677,647
Molded Pulp Dryer No. 9	1,677,647
Molded Pulp Dryer No. 10	1,677,647

Maximum Production (dry-lbs/month) = Molded Pulp Dryer maximum design capacity (MMBtu/hr) / 10.2 (MMBtu/ton) X 2000 (lb/ton) X 24 hr/day X 31 days/month

Each dryer has a maximum MMBtu/hr capacity based on its burner configuration. Historical data reveals that it requires about 10.2 MMBtu to dry one ton of product. Dividing the burner capacity by the drying requirement results in a maximum production level.

This compliance determination condition is necessary to ensure compliance with 326 IAC 2-7 (Part 70).

(b) The Cold Cleaner Degreaser has applicable compliance determination conditions as specified below:

- (1) Compliance with the solvent vapor pressure limitations shall be determined pursuant to 326 IAC 8-1-4(h) or obtaining from the manufacturer copies of the Material Safety Data Sheets (MSDS).

This compliance determination condition is necessary to ensure compliance with 326 IAC 8-3 Organic Solvent Degreasing Operations and 326 IAC 2-7 (Part 70).

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

(a) The Nine (9) Molded Pulp Dryers No. 1 – 6 and 8 – 10 have applicable compliance monitoring conditions as specified below:

- (1) The Permittee shall perform visible emission notations as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Molded Pulp Dryers No. 1 – 6 and 8 – 10 / Stacks 1 – 6 and 8 - 10	Visible Emissions	Daily	Normal-Abnormal	Response Steps

This compliance monitoring condition is necessary to ensure compliance with 326 IAC 6.8-2-34 (Lake County PM10 emission requirements – Huhtamaki Foodservice, Inc.) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal 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 February 2, 2004. Additional information was received on April 15, 2004, July 19, 2004, November 4, 2004, January 18, 2007, and August 29, 2007.

There was no notice of completeness letter mailed to the Permittee.

Conclusion

The operation of this Molded Pulp Paper Manufacturing Plant shall be subject to the conditions of the attached Part 70 Permit Renewal No. **T089-18532-00228**.

Fuel Combustion

MDC (mmBtu/hr): 5.43 HEAT CONTENT (Btu/cft): 1,035
 MDR (mmctf/hr): 0.0052 QTY BURNED (mmctf/yr): N/A

STACK ID (DIAM:HEIGHT): (1.58: 48)
 FLOWRATE (ACFM): 8,227
 Ts(°F): 242

CNTRL DEV: NONE

PERMITTED OPERATING HRS: 8760 hr/yr

SCC NO. 3-90-006-99								
POTENTIAL EMISSIONS								
BEFORE CONTROLS						AFTER CONTROLS		
POLLUTANT	EF(lbs/mmctf)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0031	0.0755	0.0138	0.0031	0.0138	N/A
NOx	100	0	0.5246	12.5913	2.2979	0.5246	2.2979	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4407	10.5767	1.9302	0.4407	1.9302	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	44	1.76		3100	250
2	50	1.47		2500	290
3	49	1.51		3200	185
Average (*Flowrate: sum)	48	1.58	23.0	8227	242

Totals for: Molded Pulp Dryer No. 1

POTENTIAL EMISSIONS								
BEFORE CONTROLS						AFTER CONTROLS		
POLLUTANT	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0218	1.1627	5.0924
PM10	0.2907	6.9760	1.2731	0.2907	1.2731	0.0055	0.2100	0.9198
SOx	0.0031	0.0755	0.0138	0.0031	0.0138	N/A	0.0031	0.0138
NOx	0.5246	12.5913	2.2979	0.5246	2.2979	N/A	0.5246	2.2979
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4513	10.8322	1.9769	0.4513	1.9769	N/A	0.4513	1.9769
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 2
(Process Emissions)

CNTRL DEV: None

MDR (T/hr): 0.532
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.70: 46)
FLOWRATE (ACFM): 8800
Ts(°F): 242

PERMITTED OPERATING HRS: 8760 hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0204
PM10	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0051
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion

CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
MDR (mmctf/hr): 0.0052

HEAT CONTENT (Btu/cft): 1,035
QTY BURNED (mmctf/yr): N/A

STACK ID (DIAM:HEIGHT): (1.70: 46)
FLOWRATE (ACFM): 8800
Ts(°F): 242

PERMITTED OPERATING HRS: 8760 hr/yr

POLLUTANT	EF(lbs/mmctf)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0031	0.0755	0.0138	0.0031	0.0138	N/A
NOx	100	0	0.5246	12.5913	2.2979	0.5246	2.2979	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4407	10.5767	1.9302	0.4407	1.9302	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.76		3100	250
2	48	1.25		2500	290
3	44	2.10		3200	185
Average (*Flowrate: sum)	46	1.70	23.0	8800	242

Totals for: Molded Pulp Dryer No. 2								
POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0204	1.1627	5.0924
PM10	0.2907	6.9760	1.2731	0.2907	1.2731	0.0051	0.2500	1.0950
SOx	0.0031	0.0755	0.0138	0.0031	0.0138	N/A	0.0031	0.0138
NOx	0.5246	12.5913	2.2979	0.5246	2.2979	N/A	0.5246	2.2979
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4513	10.8322	1.9769	0.4513	1.9769	N/A	0.4513	1.9769
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 3
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241
PM10	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmcf/hr): 0.0062
 HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmcf/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmcf)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0037	0.0890	0.0163	0.0037	0.0163	N/A
NOx	100	0	0.6184	14.8406	2.7084	0.6184	2.7084	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5194	12.4661	2.2751	0.5194	2.2751	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.75		3100	250
2	50	1.47		2500	290
3	48	2.17		3200	185
Average (*Flowrate: sum)	48	1.80	23.0	8800	242

Totals for: Molded Pulp Dryer No. 3								
POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241	1.3704	6.0021
PM10	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060	0.2900	1.2702
SOx	0.0037	0.0890	0.0163	0.0037	0.0163	N/A	0.0037	0.0163
NOx	0.6184	14.8406	2.7084	0.6184	2.7084	N/A	0.6184	2.7084
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.7828	12.1887
CO	0.5320	12.7673	2.3300	0.5320	2.3300	N/A	0.5320	2.3300
M. Chloroform	0.0002	0.0056	0.0010	0.0002	0.0010	N/A	0.0000	0.0000
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 4
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 255

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245
PM10	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.0061
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmcft/hr): 0.0062
 HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmcft/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 255

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/MMCF)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0037	0.0890	0.0163	0.0037	0.0163	N/A
NOx	100	0	0.6184	14.8406	2.7084	0.6184	2.7084	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5194	12.4661	2.2751	0.5194	2.2751	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.75		3100	290
2	50	1.47		2500	290
3	48	2.17		3200	185
Average (*Flowrate: sum)	48	1.80	23.0	8800	255

Totals for: Molded Pulp Dryer No. 4								
POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245	1.3704	6.0021
PM10	0.3426	8.2221	1.5005	0.3426	1.5005	0.0061	0.2900	1.2702
SOx	0.0037	0.0890	0.0163	0.0037	0.0163	N/A	0.0037	0.0163
NOx	0.6184	14.8406	2.7084	0.6184	2.7084	N/A	0.6184	2.7084
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.7828	12.1887
CO	0.5320	12.7673	2.3300	0.5320	2.3300	N/A	0.5320	2.3300
M. Chloroform	0.0002	0.0056	0.0010	0.0002	0.0010	N/A	0.0000	0.0000
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 5
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 47)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190
PM10	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmcf/hr): 0.0052
 HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmcf/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 47)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmcf)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0031	0.0755	0.0138	0.0031	0.0138	N/A
NOx	100	0	0.5246	12.5913	2.2979	0.5246	2.2979	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4407	10.5767	1.9302	0.4407	1.9302	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	44	1.75		3100	235
2	51	1.47		3000	235
3	45	2.17		3000	180
Average (*Flowrate: sum)	47	1.80	23.0	9100	217

Totals for: Molded Pulp Dryer No. 5								
POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190	1.1627	5.0924
PM10	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048	0.1300	0.5694
SOx	0.0031	0.0755	0.0138	0.0031	0.0138	N/A	0.0031	0.0138
NOx	0.5246	12.5913	2.2979	0.5246	2.2979	N/A	0.5246	2.2979
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4513	10.8322	1.9769	0.4513	1.9769	N/A	0.4513	1.9769
M. Chloroform	0.0002	0.0048	0.0009	0.0002	0.0009	N/A	0.0002	0.0009
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0037	0.0163
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 6
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (2.22: 52)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190
PM10	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
M. Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmcf/hr): 0.0052
 HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmcf/yr): N/A

STACK ID (DIAM:HEIGHT): (2.22: 52)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmcf)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0031	0.0755	0.0138	0.0031	0.0138	N/A
NOx	100	0	0.5246	12.5913	2.2979	0.5246	2.2979	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4407	10.5767	1.9302	0.4407	1.9302	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	58	2.34		3100	235
2	50	2.05		3000	235
3	49	2.26		3000	180
Average (*Flowrate: sum)	52	2.22	23.0	9100	217

Totals for: Molded Pulp Dryer No. 6								
POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190	1.1627	5.0924
PM10	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048	0.1300	0.5694
SOx	0.0031	0.0755	0.0138	0.0031	0.0138	N/A	0.0031	0.0138
NOx	0.5246	12.5913	2.2979	0.5246	2.2979	N/A	0.5246	2.2979
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4513	10.8322	1.9769	0.4513	1.9769	N/A	0.4513	1.9769
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 8
(Process Emissions)

MDR (T/hr): 1.127
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
FLOWRATE (ACFM): 23600

CNTRL DEV: None

Ts(°F): 232

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS			POTENTIAL EMISSIONS		
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion

MDC (mmBtu/hr): 11.5
MDR (mmcf/hr): 0.0120

HEAT CONTENT (Btu/cft): 1,035
QTY BURNED (mmcf/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)

FLOWRATE (ACFM): 23600

CNTRL DEV: NONE

Ts(°F): 232

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmcf)	CE (%)	POTENTIAL EMISSIONS			POTENTIAL EMISSIONS		
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A
NOx	100	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	1.0080	24.1920	4.4150	1.0080	4.4150	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.91		2600	230
2	50	1.72		2300	340
3	50	1.71		3700	180
4	48	1.92		15000	180

Average (*Flowrate: sum) 49 1.82 23.0 23600 233

Totals for: Molded Pulp Dryer No. 8

POLLUTANT	POTENTIAL EMISSIONS			POTENTIAL EMISSIONS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0.0072	0.1728	0.0315	0.0072	0.0315	N/A	0.0072	0.0315
NOx	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	1.0305	24.7332	4.5138	1.0305	4.5138	N/A	1.0305	4.5138
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0000	0.0000
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 9
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion

MDC (mmBtu/hr): 11.5
 MDR (mmct/hr): 0.0120

HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

CNTRL DEV: NONE

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmct)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A
NOx	100	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	1.0080	24.1920	4.4150	1.0080	4.4150	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.92		2600	230
2	51	1.72		2300	340
3	50	1.71		3700	180
4	50	2.57		15000	180

Average (*Flowrate: sum) 49 1.98 23.0 23600 233

Totals for: Molded Pulp Dryer No. 9

POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.4100	1.7958
SOx	0.0072	0.1728	0.0315	0.0072	0.0315	N/A	0.0072	0.0315
NOx	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	1.0305	24.7332	4.5138	1.0305	4.5138	N/A	1.0305	4.5138
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0000	0.0000
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Molded Pulp Dryer No. 10
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 11.5
 MDR (mmcft/hr): 0.0120

HEAT CONTENT (Btu/cft): 1,035
 QTY BURNED (mmcft/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs/mmcf)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A
NOx	100	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	1.0080	24.1920	4.4150	1.0080	4.4150	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capac 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.92		2600	230
2	50	1.71		2300	340
3	50	1.71		3700	180
4	48	1.92		15000	180

Average (*Flowrate: sum) 49 1.82 23.0 23600 233

Totals for: **Molded Pulp Dryer No. 10**

POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0.0072	0.1728	0.0315	0.0072	0.0315	N/A	0.0072	0.0315
NOx	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	1.0305	24.7332	4.5138	1.0305	4.5138	N/A	1.0305	4.5138
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0000	0.0000
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

SOURCE TOTALS w/o Insignificant Activities: Huhtamaki Foodservice

POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	14.9481	358.7546	65.4727	14.9481	65.4727	0.4381	14.9481	65.4727
PM10	3.7370	89.6887	16.3682	3.7370	16.3682	0.1095	2.4600	10.7748
SOx	0.0550	1.3202	0.2409	0.0550	0.2409	N/A	0.0550	0.2409
NOx	9.1683	220.0386	40.1570	9.1683	40.1570	N/A	9.1683	40.1570
VOC	30.1336	723.2058	131.9851	30.1336	131.9851	N/A	30.1336	131.9851
CO	7.8367	188.0804	34.3247	7.8367	34.3247	N/A	7.8367	34.3247
M. Chloroform	0.0025	0.0602	0.0110	0.0025	0.0110	N/A	0.0002	0.0009
HCl	0.0474	1.1368	0.2075	0.0474	0.2075	N/A	0.0037	0.0163
LEAD	0.0000	0.0011	0.0002	0.0000	0.0002	N/A	0.0000	0.0002

*This source is classed "Major" according to potential VOC and NOx emissions.

Insignificant Activities

Two (2) Laminators

MDR (T/hr): 0.241
 YEARLY PROD (T/yr): 2,107

STACK ID (DIAM:HEIGHT):
 FLOWRATE (ACFM):
 Ts(°F):

CNTRL DEV: None

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(LB/T)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.189	0	0.0455	1.0932	0.1995	0.0455	0.1995	#DIV/0!
PM10	0.189	0	0.0455	1.0932	0.1995	0.0455	0.1995	#DIV/0!
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	0.117	0	0.0282	0.6767	0.1235	0.0282	0.1235	N/A
CO	0.395	0	0.0952	2.2847	0.4170	0.0952	0.4170	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Cold Cleaner Degreaser

Solvent Used: Voltz II Red Synthetic Safety Solution

MDR (gal solvent/hr): 0.01
 YEARLY USAGE (gal solvent/yr): 70

CNTRL DEV: None

PERMITTED OPERATING HRS: **8760** hr/yr

POLLUTANT	EF(lbs VOC/gal coating)	CE (%)	POTENTIAL EMISSIONS					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	6.46	0	0.0516	1.2389	0.2261	0.0516	0.2261	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

VOC EF: Solvent density = 6.46 lbs/gal, 100% organic volatiles

Insignificant Activity: VOC emissions less than 3 lbs/hr or 15 lbs/day (326 IAC 2-7-1(21)).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Patrick Nienhaus
Huhtamaki Foodservice
6629 Indianapolis Blvd
Hammond, IN 46320

DATE: May 27, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Title V - Renewal
089 - 18532 - 00228

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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Toll Free (800) 451-6027
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May 27, 2009

TO: Hammond Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Huhtamaki Foodservice
Permit Number: 089 - 18532 - 00228

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Commissioner

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

TO: Interested Parties / Applicant

DATE: May 27, 2009

RE: Huhtamaki Foodservice / 089 - 18532 - 00228

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	LPOGOST 5/27/2009 Huhtamaki Foodservice, Inc. 089 - 18532 - 00228 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Patrick Nienhaus Huhtamaki Foodservice, Inc. 6629 Indianapolis Blvd Hammond IN 46320 (Source CAATS) Via confirmed delivery										
2		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
3		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
4		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
5		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
6		Hammond Public Library 564 State St Hammond IN 46320-1532 (Library)										
7		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
8		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
9		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
10		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
11		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
12		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
13		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	LPOGOST 5/27/2009 Huhtamaki Foodservice, Inc. 18532 (draft/final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Robert 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
2		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
3		Calumet Township Trustee 35 E 5th Avenue Gary IN 46402 (Affected Party)									
4		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)									
5		Susan Grenzebach OCS Environmental 130 Lincoln Street, Suite. 1 Porter IN 46304 (Affected Party)									
6		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
7		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)									
8											
9											
10											
11											
12											
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