



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 12, 2004

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

TO: Interested Parties / Applicant

RE: Inland Paperboard & Packaging, Inc / 037-19190-00115

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Inland Paperboard and Packaging, Inc.
3565 East 550 South
St. Anthony, Indiana 47575**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

Operation Permit No.: F037-19190-00115	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 12, 2004 Expiration Date: August 12, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) . The information describing the source contained in conditions A.1 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 2-8-3(b)]

The Permittee owns and operates a stationary corrugated containers manufacturing plant.

Authorized individual:	General Manager
Source Address:	3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address:	P.O. Box 37, St. Anthony, Indiana 47575
General Source Phone:	(812) 326-2125
SIC Code:	2653
Source Location Status:	Dubois
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or 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 2-8-3(c)(3)]

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

- (a) One (1) flexographic printing press (identified as Akebono), printing corrugated paperboard at a maximum line speed of 200 feet per minute. This unit was constructed prior to 1977.
- (b) Gluing unit (identified as EU-001), gluing corrugated paperboard at a maximum usage rate of 0.67 gallons per hour, applied by contact transfer. This unit was installed prior to 1977.
- (c) One (1) pneumatic trim collection system used to collect scrap cardboard pieces, with a maximum throughput rate of 14,671 pounds per hour. The pneumatic trim collection system uses a cyclone (identified as CE01), which is integral to the collection system. This unit was constructed prior to 1977.
- (d) One (1) flexographic printing press (identified as Ward), constructed in 2004, printing corrugated paperboard at a maximum line speed of 200 feet per minute.
- (e) One (1) flexographic printing press (identified as S&S 701), constructed in 2004, printing corrugated paperboard at maximum line speed of 200 feet per minute.
- (f) Gluing unit (identified as EU-002), constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.58 gallons per hour, applied by contact transfer.
- (g) Gluing unit (identified as EU-003), constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.44 gallons per hour, applied by contact transfer.
- (h) One (1) post folder/gluer (identified as EU-004), constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.47 gallons per hour, applied by contact transfer.

- (i) One (1) diecutter, used in conjunction with the pneumatic trim collection system.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

B.4 Enforceability [326 IAC 2-8-6]

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 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Southwest Regional Office
Telephone No.: 1-888-672-8323 or (812) 436-2570
Facsimile No.: (812) 436-2572

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

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

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The

notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
 - (2) If IDEM, OAQ upon receiving a timely and complete 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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades** [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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 2-8-15(c).
- (c) **Alternative Operating Scenarios** [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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 at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (PSD) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

C.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring

conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

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 2-8-4(10)]:

- (a) One (1) flexographic printing press (identified as Akebono), printing corrugated paperboard at a maximum line speed of 200 feet per minute. This unit was constructed in 1977.
- (b) Gluing unit (identified as EU-001) gluing corrugated paperboard at a maximum usage rate of 0.67 gallons per hour, applied by contact transfer. This unit was installed prior to 1977.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP),
 - (1) The amount of VOC in inks plus the VOC in clean-up solvents used for one (1) flexographic printing press (Akebono) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The input of VOC to the gluing unit (EU-001) and gluing units identified in Section D.2 shall not exceed twenty-two (22) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (3) The amount of any single HAP in inks plus the HAP in clean-up solvent used for one (1) flexographic printing press (Akebono), the gluing unit (EU-001), and the units identified in Section D.2 shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (4) The amount of any combination of HAPs in inks plus the HAPs in clean-up solvent used for one (1) flexographic printing press (Akebono), the gluing unit (EU-001), and the units identified in Section D.2 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(a)(1) and (2), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits for each press as established in Condition D.1.1(a)(1) and (2). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of ink, glue and solvent used in each press;
 - (2) The amount of ink, glue, and solvent used less water in each press;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to inks/glues and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each press;
 - (4) The total VOC usage for each press; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.1(a)(3) and (4), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1(a)(3) and (4). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The HAP content of each ink, glue and solvent used;
 - (2) The amount of ink, glue, and solvent used less water;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to inks/glues and those used as cleanup solvents.
 - (3) The total HAP usage for each month; and
 - (4) The weight of HAPs emitted for each compliance period.

- (c) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) flexographic printing press (identified as Ward), constructed in 2004, printing corrugated paperboard at a maximum line speed of 200 feet per minute.
- (e) One (1) flexographic printing press (identified as S & S 701), constructed in 2004, printing corrugated paperboard at maximum line speed of 200 feet per minute.
- (f) Gluing unit (identified as EU-002), constructed in 2004, constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.58 gallons per hour, applied by contact transfer.
- (g) Gluing unit (identified as EU-003), constructed in 2004, constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.44 gallons per hour, applied by contact transfer.
- (h) One (1) post folder/gluer (identified as EU-004), constructed in 2004, gluing corrugated paperboard at a maximum usage rate of 0.47 gallons per hour, applied by contact transfer.

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

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

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

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC13-15-5-3]

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

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP),
 - (1) The amount of VOC in inks plus the VOC in clean-up solvents used for each of the two (2) flexographic printing presses (Ward and S & S 701) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The input of VOC to the gluing units (EU-002, EU-003 and EU-004) and gluing unit identified in Section D.1 shall not exceed twenty-two (22) tons per twelve

(12) consecutive month period, with compliance determined at the end of each month.

- (3) The amount of any single HAP in inks plus the HAP in clean-up solvent used for the two (2) flexographic printing presses (Ward and S&S701), the gluing units (EU-002, EU-002, EU-004), and the units identified in Section D.1 shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (4) The amount of any combination of HAPs in inks plus the HAPs in clean-up solvent used for two (2) flexographic printing presses (Ward and S&S 701), the gluing units (EU-002, EU-003, and EU-004), and the units identified in Section D.1 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the HAP and VOC usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4(a)(1) and (2), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits for each press as established in Condition D.2.4(a)(1) and (2). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of ink, glue and solvent used in each press;
 - (2) The amount of ink, glue, and solvent used less water in each press;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to inks/glues and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each press;
 - (4) The total VOC usage for each press; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.4(a)(3) and (4), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.2.4(a)(3) and (4). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each ink, glue and solvent used;
 - (2) The amount of ink, glue, and solvent used less water;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to inks/glues and those used as cleanup solvents.
 - (3) The total HAP usage for each month; and
 - (4) The weight of HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted as described in Condition D.1.5.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description:

(c) One (1) pneumatic trim collection system used to collect scrap cardboard pieces, with a maximum throughput rate of 14,671 pounds per hour. The pneumatic trim collection system uses a cyclone (identified as CE01), which is integral to the collection system. This unit was constructed prior to 1977.

(l) One (1) diecutter, used in conjunction with the pneumatic trim collection system.

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

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the one pneumatic trim collection system used in conjunction with a diecutter shall not exceed 15.6 pounds per hour when operating at a process weight rate of 14,671 pounds per hour.

The pound per hour limitation was calculated using the equation below:

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pneumatic trim collection system.

Compliance Determination Requirements

D.3.3 Particulate Control

In order to comply with condition D.3.1, the pneumatic trim collection system consisting of a cyclone (identified as CE01) for particulate control shall be in operation and control emissions from the one (1) diecutter at all times that the diecutter is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.4 Visible Emissions Notations

(a) Once per shift visible emission notations of the pneumatic trim collection system stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.3.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone used in conjunction with the pneumatic trim collection system.

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of once per shift visible emission notations of the pneumatic trim collection system stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5.
- (c) To document compliance with Condition D.3.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115
Facility: Akebono Printing Press
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons of VOC, including the VOC usage for cleanup solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115
Facility: Ward Printing Press
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons of VOC, including the VOC usage for cleanup solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115
Facility: S&S 701 Printing Press
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons of VOC, including the VOC usage for cleanup solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115
Facility: Gluing Units (EU-001, EU-002, EU-003, and EU-004)
Parameter: VOC Usage
Limit: Less than twenty-two (22) tons of VOC per twelve (12) consecutive month
eriod, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
 Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
 Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
 FESOP No.: 037-19190-00115
 Facility: Printing Presses (Akebono, Ward, S&S 701), Gluing Units (EU-001 through EU-004)
 Parameter: A single HAP
 Limit: Less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP	Single HAP	Single HAP
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Inland Paperboard and Packaging, Inc.
 Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
 Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
 FESOP No.: 037-19190-00115
 Facility: Printing Presses (Akebono, Ward, S&S 701), Gluing Units (EU-001 through EU-004)
 Parameter: Combination of HAPs
 Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Combination of HAPs	Combination of HAPs	Combination of HAPs
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Inland Paperboard and Packaging, Inc.
Source Address: 3565 East 550 South, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 37, St. Anthony, Indiana 47575
FESOP No.: 037-19190-00115

Months: _____ to _____ Year: _____

Page 1 of 2

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.	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Inland Paperboard and Packaging, Inc.
Source Location:	3565 East 550 South, St. Anthony, Indiana 47575
County:	Dubois
SIC Code:	2653
Operation Permit No.:	037-19190-00115
Permit Reviewer:	ERG/SD

On July 3, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in The Herald, Jasper, Indiana, stating that Inland Packaging and Paperboard, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary corrugated containers manufacturing plant. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, IDEM, OAQ has decided to make the following revision to the permit. Deleted text is shown as ~~strikeout~~.

The facility description (b) included in Section D.1 was installed prior to 1977. Therefore, the reference to construction year of 2004 in this sentence is incorrect. The facility description has been corrected as shown below.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) flexographic printing press (identified as Akebono), printing corrugated paperboard at a maximum line speed of 200 feet per minute. This unit was constructed in 1977.
- (b) Gluing unit (identified as EU-001), ~~constructed in 2004~~, gluing corrugated paperboard at a maximum usage rate of 0.67 gallons per hour, applied by contact transfer. This unit was installed prior to 1977.

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

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

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Inland Paperboard and Packaging, Inc.
Source Location:	3565 East 550 South, St. Anthony, Indiana 47575
County:	Dubois
SIC Code:	2653
Operation Permit No.:	037-19190-00115
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP application from Inland Paperboard and Packaging, Inc. relating to the operation of a stationary corrugated containers manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) flexographic printing press (identified as Akebono), printing corrugated paperboard at a maximum line speed of 200 feet per minute. This unit was constructed prior to 1977.
- (b) Gluing unit (identified as EU-001), gluing corrugated paperboard at a maximum usage rate of 0.67 gallons per hour, applied by contact transfer. This unit was installed prior to 1977.
- (c) One (1) pneumatic trim collection system used to collect scrap cardboard, with a maximum throughput rate of 14,671 pounds per hour. The pneumatic trim collection system uses a cyclone (identified as CE01), which is integral to the collection system. This unit was constructed prior to 1977.

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

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (d) One (1) flexographic printing press (identified as Ward), printing corrugated paperboard at a maximum line speed of 200 feet per minute.
- (e) One (1) flexographic printing press (identified as S&S 701), printing corrugated paperboard at maximum line speed of 200 feet per minute.

- (f) Gluing unit (identified as EU-002) gluing corrugated paperboard at a maximum usage rate of 0.58 gallons per hour, applied by contact transfer.
- (g) Gluing unit (identified as EU-003) gluing corrugated paperboard at a maximum usage rate of 0.44 gallons per hour, applied by contact transfer.
- (h) One (1) post folder/gluer (identified as EU-004) gluing corrugated paperboard at a maximum usage rate of 0.47 gallons per hour, applied by contact transfer.
- (i) One (1) diecutter, used in conjunction with the pneumatic trim collection system.

These units will be constructed in 2004.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

No previous permits have been issued to this source.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the cyclone be considered as an integral part of the pneumatic trim collection system:

The intended purpose of the cyclone is to pull the paper trim material away from the diecutter and collect it for shipment off-site. The cyclone is part of a pneumatic conveying device for the transfer of paper trim material to a central collection point for baling. The bales of paper trim are sold by the source and delivered to paper brokers. Because the paper trim is sold, the trim is considered by the source as a product, and not a waste.

IDEM, OAQ has evaluated the justifications and agreed that the cyclone will be considered as an integral part of the pneumatic trim collection system. Therefore, the permitting level will be determined using the potential to emit after the cyclone. Operating conditions in the proposed permit will specify that this cyclone shall operate at all times when the pneumatic trim collection system is in operation.

Enforcement Issue

- (a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operating permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on May 17, 2004. Additional information was received on June 16, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 6).

Unrestricted Potential to Emit

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

Pollutant	Potential to Emit (tons/year)
PM	0.77
PM10	0.77
SO ₂	0.00
VOC	108
CO	0.00
NO _x	0.00

HAPs	Potential to Emit (tons/year)
Ethyl Acrylate	0.26
Acrylic Acid	1.29
Ethanolamine	14.2
Styrene	0.66
Glycol Ethers	12.0
Methyl Methacrylate	0.26
Ethylene Glycol	1.54
Methanol	0.61
Formaldehyde	0.09
Vinyl Acetate	0.07
Acetaldehyde	0.004
Total	30.9

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Akebono Flexographic Printer	0.0	0.0	0.0	Less than 25.0	0.0	0.0	See Footnote a
Ward Flexographic Printer	0.0	0.0	0.0	Less than 25.0	0.0	0.0	See footnote a
S & S 701 Flexographic Printer	0.0	0.0	0.0	Less than 25.0	0.0	0.0	See footnote a
Gluing Operations (EU-001, EU-002, EU-003, and EU-004)	0.0	0.0	0.0	Less than 22.0	0.0	0.0	See footnote a
Trim Collection System	0.77	0.77	0.0	0.0	0.0	0.0	0.0
Total Emissions	0.77	0.77	0.0	Less than 97.0	0.0	0.0	See footnote a

^a The potential to emit of any single HAP and combination of HAPs shall be limited to less than 10 and 25 tons per year, respectively.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Dubois County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were

in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring are not applicable because this source has accepted limitations on its potential to emit and agreed to operate under a Federally Enforceable State Operating Permit.
- (b) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12), because this NSPS applies only to rotogravure printing presses. Inland Paperboard and Packaging, Inc. uses only flexographic presses at this plant.

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

- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 20-18-1), because although the source has a potential to emit for any single HAP above ten (10) tons per year and any combination of HAPs above twenty-five (25) tons per year, the source has agreed to operate under a Federally Enforceable State Operating Permit (FESOP), which limits their HAP emissions to below the major source threshold levels.
- (d) This source is not subject to the requirement of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating, because although the source has potential to emit for any single HAP above ten (10) tons per year and any combination of HAPs above twenty-five (25) tons per year, the source has agreed to operate under a Federally Enforceable State Operating Permit (FESOP) which limits their HAP emissions to below the major source threshold levels.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20) and 40 CFR Parts 61 and 63) applicable to this source.

State Rule Applicability – Entire Source

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

This source was constructed prior to August 7, 1977 and is not one (1) of the twenty-eight (28) source categories. At the time of its construction, the potential to emit of each criteria pollutant before control was less than two hundred and fifty (250) tons per year. The Permittee submitted an application to IDEM, OAQ on May 17, 2004 requesting to construct and operate two (2) flexographic printing presses (identified as Ward and S&S 701), gluing operations (EU-002, EU-003, and EU-004) and one (1) diecutter. After these modifications, the potential to emit of each criteria pollutant before control remained less than two hundred and fifty (250) tons per year. Therefore, the source is a minor source under PSD and the requirements of 326 IAC 2-2 are not applicable to this modification.

326 IAC 2-6 (Emission Reporting)

This source is located in Dubois County. Although the potential to emit of VOC is greater than one hundred (100) tons per year, the Permittee has opted to operate the source under the provisions of 326 IAC 2-8 (FESOP) which limits the PTE of VOC to less than 100 tons per year. Therefore, the source is not required to operate under a Part 70 Permit and 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is not located in Bainbridge township of Dubois county. Therefore, the provisions of 326 IAC 5-1-2(2)(A) do not apply. However, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

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

The operation of this stationary corrugated containers manufacturing plant is not subject to the requirements of 326 IAC 2-4.1 (New Sources Hazardous Air Pollutants) because it is subject to the 40 CFR Part 63, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating. However, the source has requested to operate under the provisions of 326 IAC 2-8 (FESOP), which limits the potential to emit of any single HAP and combination of HAPs to less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this source.

326 IAC 2-8-4 (FESOP)

The potential to emit of VOC from the entire source is greater than one hundred (100) tons per year; and, the potential to emit for a single HAP (Ethanolamine and Glycol Ethers) is greater than ten (10) tons per year and any combination of HAPs from the entire source is greater than twenty-five (25) tons per year. Pursuant to 326 IAC 2-8-4:

- (a) In order to limit the source to less than ten (10) tons per year of any single HAP, the amount of any single HAP in inks plus the HAP in clean-up solvent used for the three (3) flexographic printing presses and gluing units, shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) In order to limit the entire source to less than twenty-five (25) tons per year of any combination of HAPs, the amount of any combination of HAPs in inks plus the HAPs in clean-up solvents used for the three (3) flexographic printing presses and gluing units shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) In order to limit the source to less than one hundred (100) tons per year of VOC:
 - (1) The amount of VOC in inks plus the VOC in clean-up solvents used for each of the three (3) flexographic printing presses (identified as Akebono, Ward, and S&S 701) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The input of VOC to the gluing units shall not exceed 22.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits ensures that VOC emissions from the entire source will be less than one hundred (100) tons per year; any combination of HAP emissions from the entire source will be less than twenty-five (25) tons per year; and any single HAP emission from the entire source will be less than ten (10) tons per year. These limits render 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because it was constructed in 1969, which is before the October 7, 1974 applicability date for this rule (326 IAC 8-6-1(2)).

State Rule Applicability – Flexographic Printing Presses

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

- (a) The one (1) Akebono flexographic printing press was constructed prior to January 1, 1980 applicability date for this rule. Therefore, it is not subject to the provisions of 326 IAC 8-1-6.
- (b) Although constructed after January 1, 1980, the (2) flexographic printing presses (identified as Ward and S&S 701) are not subject to the provisions of 326 IAC 8-1-6 because these facilities would become subject to 326 IAC 8-5-5 (Graphic Arts Operation) should they increase the ink usage. Facilities that are subject to another Article 8 rule are exempt from the requirements of 326 IAC 8-1-6.

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

- (a) The one (1) flexographic printing press (identified as Akebono) was constructed prior to November 1, 1980, the applicability date for this rule and the potential to emit of VOC from this unit is less than 100 tons per year. Therefore, it is not subject to the provisions of 326 IAC 8-5-5.
- (b) The two (2) flexographic printing presses (identified as Ward and S&S 701) were constructed after November 1, 1980, the applicability date for this rule, and each have potential to emit of VOC limited to less than twenty-five (25) tons per year pursuant to the provisions of 326 IAC 2-8 (FESOP). Therefore, these units are not subject to the requirements of 326 IAC 8-5-5.

State Rule Applicability – Trim Collection System used in conjunction with a Diecutter

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

The particulate from the trim collection system used in conjunction with the diecutter shall not exceed 15.6 pounds per hour when operating at a process weight rate of 14,671 pounds per hour.

The pounds per hour limitation was calculation using the following equation:

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

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

The pneumatic trim collection system consisting of one (1) cyclone (identified as CE01) for particulate control shall be in operation and control emissions from the one (1) diecutter at all times that the one (1) diecutter is in operation, to comply with this limit.

State Rule Applicability - Gluing Operations

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

- (a) The gluing unit (EU-001) is not subject to the provisions of 326 IAC 8-1-6, because it was constructed prior to January 1, 1980, the applicability date for this rule.

- (b) Although the new gluing units were constructed after January 1, 1980, they are not subject to 326 IAC 8-1-6 because the potential VOC emissions from these operations are less than twenty-five (25) tons per year.

326 IAC 6-3 (Process Operations)

The gluing units are not subject to 326 IAC 6-3-2 because these operations do not emit particulate matter.

Testing Requirements

No stack test is required in this FESOP because compliance with the FESOP limits for VOC and HAPs emissions can be determined by evaluating MSDS and keeping records of the amount of VOC and HAPs applied.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The trim collection system has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift emissions notations of the pneumatic trim collection system stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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 start up or shut down time. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emissions is observed.
 - (b) An inspection shall be performed each calendar quarter of the cyclone used in conjunction with the pneumatic trim collection system.
 - (c) In the event that cyclone failure has been observed:

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

These monitoring conditions are necessary because the cyclone for the trim collection system must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this corrugated containers manufacturing plant shall be subject to the conditions of the FESOP 037-19190-00115.

**Appendix A: Emissions Calculations
 VOC Emissions
 From Three (3) Flexographic Printing Presses**

Company Name: Inland Paperboard and Packaging, Inc.
Address: 3565 East 550 South, St. Anthony, Indiana 47575
Permit: 037-19190
Plt ID: 037-00115
Reviewer: ERG/SD
Date: June 21st, 2004

Press I.D.	Max. Line Speed (ft/min)	Max. Print Width (inches)	Max. Throughput (MMin ² /year)
001 - Akebono	200	185	233,366
002-Ward	200	113	142,543
003 S & S	200	110	138,758

Press I.D	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
001 - Akebono	10.0	3.36%	100%	39.2
002-Ward	10.0	3.36%	100%	23.9
003 S & S	10.0	3.36%	100%	23.3
TOTAL PTE of VOC (tons/year) =				86.5

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

METHODOLOGY

Max. Throughput (MMin²/year) = Maxium line speed (feet/minute) * 12 inches/foot * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year * 1/10⁶ (MMin²/1,000,000 in²)
 PTE of VOC (tons/year) = Maximum Coverage lbs/MMin² * Weight % volatiles * Flash off % * Max. throughput (MMin²/year) * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
HAP Emissions
From Three (3) Flexographic Printing Presses

Company Name: Inland Paperboard and Packaging, Inc.
Address: 3565 East 550 South, St. Anthony, Indiana 47575
Permit: 037-19190
Plt ID: 037-00115
Reviewer: ERG/SD
Date: June 21st, 2004

Emission Unit	Max. Coverage (lbs/MMin ²)	Flash Off (%)	Max. Throughput (MMin ² /year)
001 - Akebono/Ink	10.0	100%	233,366
003- S& S/Ink	10.0	100%	138,758
002 - Ward/Ink	10.0	100%	142,543

POTENTIAL TO EMIT OF HAPS

Emission Unit	Ethyl Acrylate		Acrylic Acid		Ethanolamine		Styrene		Glycol Ethers		MMA		Ethylene Glycol	
	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)
001 - Akebono/Ink	0.01%	0.12	0.05%	0.58	0.55%	6.42	0.02%	0.23	0.58%	6.77	0.01%	0.12	0.06%	0.70
003- S& S/Ink	0.01%	0.07	0.05%	0.35	0.55%	3.82	0.03%	0.21	0.37%	2.57	0.01%	0.07	0.06%	0.42
002 - Ward/Ink	0.01%	0.07	0.05%	0.36	0.55%	3.92	0.03%	0.21	0.37%	2.64	0.01%	0.07	0.06%	0.43
TOTAL PTE OF HAPS		0.26		1.29		14.2		0.66		12.0		0.26		1.54

METHODOLOGY

PTE of HAPs (tons/year) = Maximum coverage (lbs/MMin²) * Weight % HAP * Flash off % * Maximum throughput (MMin²/year) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and PM/PM10 Emissions
From Gluing Operations**

Company Name: Inland Paperboard and Packaging, Inc.
Address: 3565 East 550 South, St. Anthony, Indiana 47575
Permit: 037-19190
Plt ID: 037-00115
Reviewer: ERG/SD
Date: June 21st, 2004

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage Rate (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lb/hour)	PTE of VOC (lb/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/year)	* Transfer Efficiency
EU-001	WB-2527	10.4	60.7%	38.3%	22.4%	48.1%	62.0%	0.67	4.49	2.33	1.56	37.5	6.84	0.0	100%
	WB-3701	9.10	55.8%	44.6%	11.2%	49.5%	50.5%	0.67	2.01	1.02	0.68	16.3	2.98	0.0	100%
	HL-7268	8.17	0.0%	0.0%	0.0%	0.0%	100%	0.67	0.00	0.00	0.00	0.00	0.00	0.0	100%
EU-002	WB-2527	10.4	60.7%	38.3%	22.4%	48.1%	62.0%	0.58	4.49	2.33	1.34	32.2	5.88	0.0	100%
	WB-3701	9.10	55.8%	44.6%	11.2%	49.5%	50.5%	0.58	2.01	1.02	0.59	14.1	2.57	0.0	100%
	HL-7268	8.17	0.0%	0.0%	0.0%	0.0%	100%	0.58	0.00	0.00	0.00	0.00	0.00	0.0	100%
EU-003	WB-2527	10.4	60.7%	38.3%	22.4%	48.1%	62.0%	0.44	4.49	2.33	1.0	24.4	4.45	0.0	100%
	WB-3701	9.10	55.8%	44.6%	11%	49.5%	50.5%	0.44	2.01	1.02	0.44	10.7	1.94	0.0	100%
	HL-7268	8.17	0.0%	0.0%	0%	0.0%	100%	0.44	0.00	0.00	0.00	0.00	0.00	0.0	100%
EU-004	WB-2527	10.4	60.7%	38.3%	22%	48.1%	62.0%	0.47	4.49	2.33	1.10	26.5	4.83	0.0	100%
	WB-3701	9.10	55.8%	44.6%	11%	49.5%	50.5%	0.47	2.01	1.02	0.48	11.6	2.11	0.0	100%
	HL-7268	8.17	0.0%	0.0%	0%	0.0%	100%	0.47	0.00	0.00	0.00	0.00	0.00	0.0	100%
TOTAL											5.0	22.0			

Worst Case VOC (ton/year) = 22.0
Worst Case PM/PM10 (ton/year) = 0.00
Actual VOC (lbs/day) = 80

* Material applied by contact transfer, which is 100% transfer efficiency.

METHODOLOGY

Pounds of VOC per gallon coating less Water = Density (lb/gal) * Weight % Organics * 1 / (1-Volume % Water)

Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics

PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour)

PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 24 hour/day

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency) * 8760 hours/year * 1ton/2000 lbs

Actual VOC (lbs/day) = PTE (lbs/hour) * Actual Hours of Operation (4000 hours/year) * 1year/250 Days of Operation

**Appendix A: Emissions Calculations
HAP Emissions
From Gluing Operations**

Company Name: Inland Paperboard and Packaging, Inc.
Address: 3565 East 550 South, St. Anthony, Indiana 47575
Permit: 037-19190
Plt ID: 037-00115
Reviewer: ERG/SD
Date: June 21st, 2004

Emission Unit	Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Methanol		Formaldehyde		Vinyl Acetate		Acetaldehyde	
				Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)	Weight %	(tons/year)
EU-001	WB-2527	10.4	0.67	0.62%	0.19	0.09%	0.03	0.07%	0.02	0.004%	0.001
	WB-3701	9.10	0.67	0.03%	0.01	0.09%	0.02	0.07%	0.02	0.004%	0.001
EU-002	WB-2527	10.4	0.58	0.62%	0.16	0.09%	0.02	0.07%	0.02	0.004%	0.001
	WB-3701	9.10	0.58	0.03%	0.01	0.09%	0.02	0.07%	0.02	0.004%	0.001
EU-003	WB-2527	10.4	0.44	0.62%	0.12	0.09%	0.02	0.07%	0.01	0.004%	0.001
	WB-3701	9.10	0.44	0.03%	0.01	0.09%	0.02	0.07%	0.01	0.004%	0.001
EU-004	WB-2527	10.4	0.47	0.62%	0.13	0.09%	0.02	0.07%	0.02	0.004%	0.001
	WB-3701	9.10	0.47	0.03%	0.01	0.09%	0.02	0.07%	0.01	0.004%	0.001
Worst Case HAP (ton/year) =				0.61	0.09	0.07	0.004				

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Max. usage rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
PM/PM10 Emissions
From Pneumatic Conveying**

Company Name: Inland Paperboard and Packaging, Inc.
Address: 3565 East 550 South, St. Anthony, Indiana 47575
Permit: 037-19190
Plt ID: 037-00115
Reviewer: ERG/SD
Date: June 21st, 2004

TRIM COLLECTION SYSTEM	POTENTIAL TO EMIT PM/PM10	
	After Control (ton/year)	Before Control (ton/year)
* Particulate Control Equipment = Cyclone		
Outlet Grain Loading (grains/acf) = 0.001	0.77	7.66
Air Flow Rate (acf/minute) = 20400		
Control Efficiency (%) = 90%		

* Assume all PM emissions are equal to PM10.

METHODOLOGY

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

**Appendix A: Emissions Calculations
Summary**

Company Name: Inland Paperboard and Packaging, Inc.

Address: 3565 East 550 South, St. Anthony, Indiana 47575

Permit: 037-19190

Plt ID: 037-00115

Reviewer: ERG/SD

Date: June 21st, 2004

UNLIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO ₂	NO _x	VOC	CO	** Single Highest HAP	Combination of HAPs
001 - Akebono	0.0	0.0	0.0	0.0	39.2	0.0	14.2	30.1
002-Ward	0.0	0.0	0.0	0.0	23.9	0.0		
003 S & S	0.0	0.0	0.0	0.0	23.3	0.0		
EU001 - Gluing	0.0	0.0	0.0	0.0	6.84	0.0	0.77	0.77
EU002 - Gluing	0.0	0.0	0.0	0.0	5.88	0.0		
EU003 - Gluing	0.0	0.0	0.0	0.0	4.45	0.0		
EU004 - Post Folder	0.0	0.0	0.0	0.0	4.83	0.0		
Trim Collection	0.77	0.77	0.0	0.0	0.0	0.0	0.0	0.0
	0.77	0.77	0.00	0.00	108	0.00	14.2	30.9

** Ethanolamine

LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO ₂	NO _x	VOC	CO	Single Highest HAP	Combination of HAPs
001 - Akebono	0.0	0.0	0.0	0.0	25.0	0.0	See footnote *	See footnote *
002-Ward	0.0	0.0	0.0	0.0	25.0	0.0		
003 S & S	0.0	0.0	0.0	0.0	25.0	0.0		
EU001 - Gluing	0.0	0.0	0.0	0.0	6.84	0.0	See footnote *	See footnote *
EU002 - Gluing	0.0	0.0	0.0	0.0	5.88	0.0		
EU003 - Gluing	0.0	0.0	0.0	0.0	4.45	0.0		
EU004 - Post Folder	0.0	0.0	0.0	0.0	4.83	0.0		
Trim Collection	0.77	0.77	0.0	0.0	0.0	0.0	0.0	0.0
	0.77	0.77	0.00	0.00	97.0	0.00		

* The potential to emit of any single HAP and combination of HAPs shall be limited to less than 10 and 25 tons per year, respectively.