



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 10, 2006
RE: Jet Corr, Inc. / 127-19359-00094
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 1/10/05



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Indianapolis, Indiana 46204-2251
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Jet Corr, Inc.
3155 State Road 49
Valparaiso, Indiana 46383

(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.

Operation Permit No.: F 127-19359-00094	
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 10, 2006 Expiration Date: February 10, 2011

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a corrugated box manufacturing source.

Authorized individual:	General Manager
Source Address:	3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address:	3155 State Road 49, Valparaiso, Indiana 46383
General Source Phone:	219 - 548 - 9191
SIC Code:	2653
Source Location Status:	Porter
	Severe Nonattainment for 1-hour ozone standard
	Moderate Nonattainment for 8-hour ozone standard
	Nonattainment for PM _{2.5}
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act

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) 3-color 48-inch flexographic printer-folder-gluer machine, identified as EU 003, installed in 1999, capacity: 250 sheets per minute.
- (b) One (1) 4-color 48-inch flexographic printer-folder-gluer machine, identified as EU 004, installed in 1999, capacity: 250 sheets per minute.
- (c) One (1) 94.5-inch EMBA press, identified as EU 005, installed in 1999, capacity: 957 feet per minute.
- (d) One (1) 2-color flexographic printer-folder-gluer machine, identified as EU 012, installed in 2001, capacity: 100 sheets per minute at 89 inches by 205 inches, capacity: 1,708.33 feet per minute line speed.
- (e) One (1) flexographic printer-folder-gluer machine, identified as EU 018, installed in 2001, capacity: 79.2 million square inches of paper per hour.
- (f) One (1) flexographic model 170 folder gluer machine, identified as EU 019, installed in 2003, capacity: 925 feet per minute line speed.
- (g) One (1) baler system, equipped with a cyclone and a baghouse, identified as EU 009, installed in 2000, modified in 2003, exhausted to Stack S003 or back into the building, capacity: 6,400 pounds of corrugated trimmings per hour, with one (1) identical backup baler to be utilized only in the event of failure of the primary baler unit.

- (h) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 001, installed in 1999, rated at 20.92 million British thermal units per hour, exhausted through Stack S001.
- (i) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 013, installed in 2001, rated at 20.92 million British thermal units per hour, exhausted through Stack S002.

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

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

- (a) Natural gas-fired combustion sources each with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of six (6) natural gas-fired makeup air units and eighteen (18) natural gas-fired unit heaters, collectively identified as EU 011, rated at 39.23 million British thermal units per hour total [326 IAC 2-8-4].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment consisting of miscellaneous cutting torches, identified as EU 010, installed in 1999.
- (c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one (1) percent by volume, installed in 1999.
- (d) On-site fire and emergency response training approved by the department.
- (e) One (1) above-ground storage tank, capacity: 1,000 gallons of No. 2 fuel oil, identified as EU 002, installed in 1999.
- (f) One (1) cold solvent degreaser, identified as EU 007, installed in 1999 [326 IAC 8-3-2, 326 IAC 8-3-5].
- (g) Rotary die cutters, identified as EU 008, installed 1999 and 2001 [326 IAC 6-3].
- (h) One (1) closed loop waste water system, identified as EU 020, installed in 1999.
- (i) Starch silo, equipped with a baghouse, installed in 1999 [326 IAC 6-3].
- (j) Two (2) paper corrugating machines, identified as EU 006, installed in 2001 [326 IAC 2-8-4].

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) to renew 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) deleted

by 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. One (1) certification may cover multiple forms in one (1) submittal.
- (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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

- (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 maintain Preventive Maintenance Plans (PMPs), including the following information on each facility:

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

B.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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

Northwest Regional Office: 219-757-0265, Facsimile Number: 219-757-0267

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(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) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.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
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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
Indianapolis, IN 46204-2251

- (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
Indianapolis, Indiana 46204-2251
- 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
Indianapolis, Indiana 46204-2251

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(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.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.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] [IC 13-17-3-2]

- (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
Indianapolis, Indiana 46204-2251

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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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 [326 IAC 6-3-2]

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

C.2 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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 volatile organic compounds (VOCs) and NO_x from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM), volatile organic compounds (VOCs) and NO_x shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
- (3) 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
- (4) 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) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) 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.

(d) 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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 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.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 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.18 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.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.

The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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)]: Printing and Gluing Operations

- (a) One (1) 3-color 48-inch flexographic printer-folder-gluer machine, identified as EU 003, installed in 1999, capacity: 250 sheets per minute.
- (b) One (1) 4-color 48-inch flexographic printer-folder-gluer machine, identified as EU 004, installed in 1999, capacity: 250 sheets per minute.
- (c) One (1) 94.5-inch EMBA press, identified as EU 005, installed in 1999, capacity: 957 feet per minute.
- (d) One (1) 2-color flexographic printer-folder-gluer machine, identified as EU 012, installed in 2001, capacity: 100 sheets per minute at 89 inches by 205 inches, capacity: 1,708.33 feet per minute line speed.
- (e) One (1) flexographic printer-folder-gluer machine, identified as EU 018, installed in 2001, capacity: 79.2 million square inches of paper per hour.
- (f) One (1) flexographic model 170 folder gluer machine, identified as EU 019, installed in 2003, capacity: 925 feet per minute line speed.

(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 2-8-4] [326 IAC 2-3]

- (a) The total VOC content delivered to the printing and gluing operations, identified as EU 003, EU 004, EU 005, EU 012, EU 018 and EU 019, including the two (2) corrugating machines, identified as EU 006 (deemed insignificant activities) shall be limited to less than 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Compliance with this limit combined with the potential to emit VOC from the two (2) boilers, the limited potential to emit VOC from the insignificant natural gas combustion and the potential to emit VOC from all other insignificant activities satisfies the requirements of 326 IAC 2-8-4 and renders the requirements of 326 IAC 2-3 not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The total combination of HAPs delivered to the entire source shall be limited to less than ten (10) tons per year. Compliance with this limit satisfies the requirements of 326 IAC 2-8-4.

D.1.3 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 and their control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) and HAPs

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.

IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.1.1 and D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC and HAPs usage for each month; and
 - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

D.1.7 Reporting Requirements [326 IAC 8-5-5] [326 IAC 8-7-6] [326 IAC 8-1-9(b)]

Pursuant to 326 IAC 8-5-5(a)(3)(B), the source located in Porter County with limited potential to emit VOCs of greater than ten (10) tons per year and less than twenty-five (25) tons per year shall comply with the requirements of 326 IAC 8-7-2(c) that requires compliance with 326 IAC 8-7-6 and 326 IAC 8-1-9(b). These rules require the following:

- (a) Pursuant to 326 IAC 8-7-6, each source or facility shall submit to the IDEM, OAQ a certification that the facility is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:
- (1) The name and address of the source and the name and telephone number of the company representative.
 - (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
 - (3) A listing of facilities which meet the requirements of section 2(a) of this rule.
 - (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.

- (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
- (5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.
- (b) Pursuant to 326 IAC 8-1-9(b), records required by 326 IAC 8-1-9 or records required to show that a source is exempt from the requirements of 326 IAC 8, shall be submitted to the IDEM, OAQ or the U.S. EPA within thirty (30) days of the receipt of a written request.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (g) One (1) baler system, equipped with a cyclone and a baghouse, identified as EU 009, installed in 2000, modified in 2003, exhausted to Stack S003 or back into the building, capacity: 6,400 pounds of corrugated trimmings per hour, with one (1) identical backup baler to be utilized only in the event of failure of the primary baler unit.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the baler system shall not exceed 8.94 pounds per hour when operating at a process weight rate of 6,400 pounds per hour.

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

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

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

D.2.2 PM₁₀ Limitation [326 IAC 2-8-4] [326 IAC 2-3]

The PM₁₀ emissions from the baler system shall not exceed 8.94 pounds per hour. Compliance with this limit satisfies the requirements of 326 IAC 2-8-4.

D.2.3 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 this facility and its control device.

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

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclone for particulate control shall be in operation and control emissions from the baler system at all times that the baler system is in operation.

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the baler system stack exhaust S003 shall be performed during normal daylight operations once per day when the baler system is in operation and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Cyclone failure can be indicated by a significant drop in the cyclone's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the baler system stack exhaust S003 once per day when the baler system is in operation and exhausting to the atmosphere.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (h) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 001, installed in 1999, rated at 20.92 million British thermal units per hour, exhausted through Stack S001.
- (i) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 013, installed in 2001, rated at 20.92 million British thermal units per hour, exhausted through Stack S002.

(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.3.1 Nitrogen Oxides (NO_x) [326 IAC 2-3]

- (a) The two (2) boilers, identified as EU 001 and EU 013, shall be equipped with low NO_x burners for natural gas combustion with a manufacturer's guarantee of 0.05 pounds per million British thermal units or less.
- (b) The total input of No. 2 fuel oil to the two (2) boilers, identified as EU 001 and EU 013, shall be limited to 350.0 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) Compliance with these limits combined with the potential to emit from the insignificant activities renders the requirements of 326 IAC 2-3 not applicable to the entire source.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the 20.92 million British thermal units per hour boilers, identified EU 001 and EU 013, when combusting fuel oil, shall each not exceed five tenths (0.5) pounds per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.3.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from two (2) boilers, identified as EU 001 and EU 013 shall be limited to 0.413 pounds per million British thermal units heat input each.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units heat input = 41.84. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

D.3.4 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 and their control devices.

Compliance Determination Requirements

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.3.2 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million British thermal units heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhausts S001 and S002 shall be performed once per day during normal daylight operations when combusting No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the NO_x and SO₂ emission limits established in Conditions D.3.1 and D.3.2.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period. The natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts S001 and S002 once per day when combusting No. 2 fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.3.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1-1(1).
- (b) The Permittee shall certify, on the form provided, that natural gas was fired in both boilers at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned in each boiler during each quarter.

D.3.9 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR Part 60.40c, the Permittee shall comply with the provision of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1 for the two (2) boilers, identified as EU 001 and EU 013, as specified in Appendix A of 40 CFR Part 60, Subpart Dc in accordance with the schedule in 40 CFR Part 60, Subpart Dc.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

D.3.10 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units Requirements [40 CFR Part 60, Subpart Dc] [326 IAC 12-1]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60.40c, which are incorporated by reference as 326 IAC 12-1 for the two (2) boilers, identified as EU 001 and EU 013 as specified as follows:

§60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units which meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996]

§60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam ch a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society for Testing and Materials in ASTM D388-77, "Standard Specification for Classification of Coals by Rank" (incorporated by reference—see §60.17); coal refuse; and petroleum coke. Synthetic fuels derived from coal for the purpose of creating useful heat, including but not limited to solvent-refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to

the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

Dry flue gas desulfurization technology means a sulfur dioxide (SO₂) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO₂ control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, “Standard Specification for Liquefied Petroleum Gases” (incorporated by reference—see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO₂ emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO₂.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000]

§60.42c Standard for sulfur dioxide.

(d) On and after the date on which the initial performance test is completed or required to be completed under §60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

(e) On and after the date on which the initial performance test is completed or required to be completed under §60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, or coal and oil with any other fuel shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of the following:

(2) The emission limit determined according to the following formula for any affected facility that combusts coal, oil, or coal and oil with any other fuel:

$$E_s = (K_a H_a + K_b H_b + K_c H_c) / (H_a + H_b + H_c)$$

where:

E_s is the SO₂ emission limit, expressed in ng/J or lb/million Btu heat input,

K_a is 520 ng/J (1.2 lb/million Btu),

K_b is 260 ng/J (0.60 lb/million Btu),

K_c is 215 ng/J (0.50 lb/million Btu),

H_a is the heat input from the combustion of coal, except coal combusted in an affected facility subject to paragraph (b)(2) of this section, in Joules (J) [million Btu]

H_b is the heat input from the combustion of coal in an affected facility subject to paragraph (b)(2) of this section, in J (million Btu)

H_c is the heat input from the combustion of oil, in J (million Btu).

(g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.

(h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f)(1), (2), or (3), as applicable.

(1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 million Btu/hr).

(i) The SO₂ emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

(j) Only the heat input supplied to the affected facility from the combustion of coal and oil is counted under this section. No credit is provided for the heat input to the affected facility from wood or other fuels or for heat derived from exhaust gases from other sources, such as stationary gas turbines, internal combustion engines, and kilns.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000]

§60.44c Compliance and performance test methods and procedures for sulfur dioxide.

(a) Except as provided in paragraphs (g) and (h) of this section and in §60.8(b), performance tests required under §60.8 shall be conducted following the procedures specified in paragraphs (b), (c), (d), (e), and (f) of this section, as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in §60.8(d) applies only to the initial performance test unless otherwise specified by the Administrator.

(b) The initial performance test required under §60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO₂ emission limits under §60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affect facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions.

(c) After the initial performance test required under paragraph (b) and §60.8, compliance with the percent reduction requirements and SO₂ emission limits under §60.42c is based on the average percent reduction and the average SO₂ emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average percent reduction and SO₂ emission rate are calculated to show compliance with the standard.

(d) If only coal, only oil, or a mixture of coal and oil is combusted in an affected facility, the procedures in Method 19 are used to determine the hourly SO₂ emission rate (E_{ho}) and the 30-day average SO₂ emission rate (E_{ao}). The hourly averages used to compute the 30-day averages are obtained from the continuous emission monitoring system (CEMS). Method 19 shall be used to calculate E_{ao} when using daily fuel sampling or Method 6B.

(e) If coal, oil, or coal and oil are combusted with other fuels:

(1) An adjusted E_{ho} (E_{ho0}) is used in Equation 19–19 of Method 19 to compute the adjusted E_{ao} (E_{ao0}). The E_{ho0} is computed using the following formula:

$$E_{ho0} = [E_{ho} - E_w(1 - X_k)] / X_k$$

where:

E_{ho0} is the adjusted E_{ho}, ng/J (lb/million Btu)

E_{ho} is the hourly SO₂ emission rate, ng/J (lb/million Btu)

E_w is the SO₂ concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 9, ng/J (lb/million Btu). The value E_w for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_w if the owner or operator elects to assume E_w=0.

X_k is the fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19.

(2) The owner or operator of an affected facility that qualifies under the provisions of §60.42c(c) or (d) [where percent reduction is not required] does not have to measure the parameters E_w or X_k if the owner or operator of the affected facility elects to measure emission rates of the coal or oil using the fuel sampling and analysis procedures under Method 19.

(f) Affected facilities subject to the percent reduction requirements under §60.42c(a) or (b) shall determine compliance with the SO₂ emission limits under §60.42c pursuant to paragraphs (d) or (e) of this section, and shall determine compliance with the percent reduction requirements using the following procedures:

(2) If coal, oil, or coal and oil are combusted with other fuels, the same procedures required in paragraph (f)(1) of this section are used, except as provided in the following:

(i) To compute the %P_s, an adjusted %R_g (%R_{g0}) is computed from E_{ao0} from paragraph (e)(1) of this section and an adjusted average SO₂ inlet rate (E_{ai0}) using the following formula:

$$\%R_{g0} = 100 [1.0 - E_{ao0}/E_{ai0}]$$

where:

$\%R_{g0}$ is the adjusted $\%R_g$, in percent

E_{a0} is the adjusted E_{a0} , ng/J (lb/million Btu)

E_{ai0} is the adjusted average SO_2 inlet rate, ng/J (lb/million Btu)

(ii) To compute E_{ai0} , an adjusted hourly SO_2 inlet rate (E_{hi0}) is used. The E_{hi0} is computed using the following formula:

$$E_{hi0} = [E_{hi} - E_w (1 - X_k)] / X_k$$

where:

E_{hi0} is the adjusted E_{hi} , ng/J (lb/million Btu)

E_{hi} is the hourly SO_2 inlet rate, ng/J (lb/million Btu)

E_w is the SO_2 concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 19, ng/J (lb/million Btu). The value E_w for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_w if the owner or operator elects to assume $E_w = 0$.

X_k is the fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19.

(g) For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).

(h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f)(1), (2), or (3), as applicable.

(i) The owner or operator of an affected facility seeking to demonstrate compliance with the SO_2 standards under §60.42c(c)(2) shall demonstrate the maximum design heat input capacity of the steam generating unit by operating the steam generating unit at this capacity for 24 hours. This demonstration shall be made during the initial performance test, and a subsequent demonstration may be requested at any other time. If the demonstrated 24-hour average firing rate for the affected facility is less than the maximum design heat input capacity stated by the manufacturer of the affected facility, the demonstrated 24-hour average firing rate shall be used to determine the annual capacity factor for the affected facility; otherwise, the maximum design heat input capacity provided by the manufacturer shall be used.

(j) The owner or operator of an affected facility shall use all valid SO_2 emissions data in calculating $\%P_s$ and E_{ho} under paragraphs (d), (e), or (f) of this section, as applicable, whether or not the minimum emissions data requirements under §60.46c(f) are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating $\%P_s$ or E_{ho} pursuant to paragraphs (d), (e), or (f) of this section, as applicable.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000]

§60.46c Emission monitoring for sulfur dioxide

(d) As an alternative to operating a CEMS at the inlet to the SO_2 control device (or outlet of the steam generating unit if no SO_2 control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO_2 emission rate by sampling the fuel prior to combustion. As an alternative to operating a CEMS at the outlet from the SO_2 control device (or outlet of the steam generating unit if no SO_2 control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO_2 emission rate by using Method 6B. Fuel sampling shall be conducted pursuant to either paragraph (d)(1) or (d)(2) of this section. Method 6B shall be conducted pursuant to paragraph (d)(3) of this section.

(1) For affected facilities combusting coal or oil, coal or oil samples shall be collected daily in an as-fired condition at the inlet to the steam generating unit and analyzed for sulfur content and heat content according to Method 19. Method 19 provides procedures for converting these measurements into the format to be used in calculating the average SO_2 input rate.

(2) As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and

before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less.

(3) Method 6B may be used in lieu of CEMS to measure SO₂ at the inlet or outlet of the SO₂ control system. An initial stratification test is required to verify the adequacy of the Method 6B sampling location. The stratification test shall consist of three paired runs of a suitable SO₂ and carbon dioxide measurement train operated at the candidate location and a second similar train operated according to the procedures in §3.2 and the applicable procedures in section 7 of Performance Specification 2 (appendix B). Method 6B, Method 6A, or a combination of Methods 6 and 3 or Methods 6C and 3A are suitable measurement techniques. If Method 6B is used for the second train, sampling time and timer operation may be adjusted for the stratification test as long as an adequate sample volume is collected; however, both sampling trains are to be operated similarly. For the location to be adequate for Method 6B 24-hour tests, the mean of the absolute difference between the three paired runs must be less than 10 percent (0.10).

(e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, as described under §60.48c(f) (1), (2), or (3), as applicable.

(f) The owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section, or conducting as-fired fuel sampling pursuant to paragraph (d)(1) of this section, shall obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive steam generating unit operating days. If this minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the Administrator.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000]

§60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

(b) The owner or operator of each affected facility subject to the SO₂ emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B.

(d) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.

(e) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.43c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.

- (1) Calendar dates covered in the reporting period.
 - (2) Each 30-day average SO₂ emission rate (nj/J or lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - (3) Each 30-day average percent of potential SO₂ emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.
 - (4) Identification of any steam generating unit operating days for which SO₂ or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
 - (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit.
 - (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
 - (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
 - (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), or (3) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.
- (f) Fuel supplier certification shall include the following information:
- (1) For distillate oil:
 - (i) The name of the oil supplier; and
 - (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c.
 - (g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
 - (h) The owner or operator of each affected facility subject to a Federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.
 - (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
 - (j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources each with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of six (6) natural gas-fired makeup air units and eighteen (18) natural gas-fired unit heaters, collectively identified as EU 011, rated at 39.23 million British thermal units per hour total [326 IAC 2-8-4].
- (f) One (1) cold solvent degreaser, identified as EU 007, installed in 1999 [326 IAC 8-3-2, 326 IAC 8-3-5].
- (g) Rotary die cutters, identified as EU 008, installed 1999 and 2001 [326 IAC 6-3].
- (i) Starch silo, equipped with a baghouse, installed in 1999 [326 IAC 6-3].
- (j) Two (2) paper corrugating machines, identified as EU 006, installed in 2001 [326 IAC 2-8-4].

(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.4.1 Nitrogen Oxides (NO_x) [326 IAC 2-3]

- (a) The six (6) natural gas-fired makeup air units and eighteen (18) natural gas-fired unit heaters, collectively identified as EU 011, rated at a total of 39.23 million British thermal units per hour, shall not operate during June, July and August of each year.
- (b) Compliance with this limit combined with the limited potential to emit from the two (2) boilers renders the requirements of 326 IAC 2-3 not applicable to the entire source.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the rotary die cutters, identified as EU 008, and from the starch silo shall not exceed an amount determined by the following:

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

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

D.4.5 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4] [326 IAC 2-3]

- (a) The total VOC content delivered to the printing and gluing operations, identified as EU 003, EU 004, EU 005, EU 012, EU 018 and EU 019, including the two (2) corrugating machines, identified as EU 006 (deemed insignificant activities) shall be limited to less than 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Compliance with this limit combined with the potential to emit VOC from the two (2) boilers, the limited potential to emit VOC from the insignificant natural gas combustion and the potential to emit VOC from all other insignificant activities satisfies the requirements of 326 IAC 2-8-4 and renders the requirements of 326 IAC 2-3 not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 2-8-16]

D.4.6 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records of which months of the year the six (6) natural gas-fired makeup air units and eighteen (18) natural gas-fired unit heaters, collectively known as EU 011, operate in a log book.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094

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
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094

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

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

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: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094
Facilities: Printing and gluing operations, identified as EU 003, EU 004, EU 005, EU 012, EU 018 and EU 019, including the two (2) corrugating machines, identified as EU 006
Parameter: VOC delivered to the applicators
Limit: Less than 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094
Facilities: Entire Source
Parameter: Total Combination of HAPs
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Total Combination of HAPs (tons)	Total Combination of HAPs (tons)	Total Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094
Facilities: Two (2) boilers, identified as EU 001 and EU 013
Parameter: No. 2 fuel oil
Limit: A total of 350.0 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Amount of No. Fuel Oil (kilogallons)	Amount of No. Fuel Oil (kilogallons)	Amount of No. Fuel Oil (kilogallons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Jet Corr, Inc.
Source Address: 3155 State Road 49, Valparaiso, Indiana 46383
Mailing Address: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP No.: F 127-19359-00094

Months: _____ to _____ Year: _____

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

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Jet Corr, Inc.
Source Location:	3155 State Road 49, Valparaiso, Indiana 46383
County:	Porter
SIC Code:	2653
Operation Permit No.:	127-11731-00094
Operation Permit Issuance Date:	April 4, 2000
Permit Renewal No.:	127-19359-00094
Permit Reviewer:	Frank P. Castelli

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Jet Corr, Inc. relating to the operation of a corrugated box manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) 3-color 48-inch flexographic printer-folder-gluer machine, identified as EU 003, installed in 1999, capacity: 250 sheets per minute.
- (b) One (1) 4-color 48-inch flexographic printer-folder-gluer machine, identified as EU 004, installed in 1999, capacity: 250 sheets per minute.
- (c) One (1) 94.5-inch EMBA press, identified as EU 005, installed in 1999, capacity: 957 feet per minute.
- (d) One (1) 2-color flexographic printer-folder-gluer machine, identified as EU 012, installed in 2001, capacity: 100 sheets per minute at 89 inches by 205 inches, capacity: 1,708.33 feet per minute line speed.
- (e) One (1) flexographic printer-folder-gluer machine, identified as EU 018, installed in 2001, capacity: 79.2 million square inches of paper per hour.
- (f) One (1) flexographic model 170 folder gluer machine, identified as EU 019, installed in 2003, capacity: 925 feet per minute line speed.
- (g) One (1) baler system, equipped with a cyclone and a baghouse, identified as EU 009, installed in 2000, modified in 2003, exhausted to Stack S003 or back into the building, capacity: 6,400 pounds of corrugated trimmings per hour, with one (1) identical backup baler to be utilized only in the event of failure of the primary baler unit.
- (h) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 001, installed in 1999, rated at 20.92 million British thermal units per hour, exhausted through Stack S001.
- (i) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 013, installed in 2001, rated at 20.92 million British thermal units per hour, exhausted through Stack S002.

Unpermitted Emission Units and Pollution Control Equipment

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

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

There are no proposed emission units during this review process.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources each with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of six (6) natural gas-fired makeup air units and eighteen (18) natural gas-fired unit heaters, collectively identified as EU 011, rated at 39.23 million British thermal units per hour total [326 IAC 2-8-4].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment consisting of miscellaneous cutting torches, identified as EU 010, installed in 1999.
- (c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one (1) percent by volume, installed in 1999.
- (d) On-site fire and emergency response training approved by the department.
- (e) One (1) above-ground storage tank, capacity: 1,000 gallons of No. 2 fuel oil, identified as EU 002, installed in 1999.
- (f) One (1) cold solvent degreaser, identified as EU 007, installed in 1999 [326 IAC 8-3-2, 326 IAC 8-3-5].
- (g) Rotary die cutters, identified as EU 008, installed 1999 and 2001 [326 IAC 6-3].
- (h) One (1) closed loop waste water system, identified as EU 020, installed in 1999.
- (i) Starch silo, equipped with a baghouse, installed in 1999 [326 IAC 6-3].
- (j) Two (2) paper corrugating machines, identified as EU 006, installed in 2001.

Existing Approvals

The source has been operating under the previous FESOP 127-11731-00094 issued on April 4, 2000 and the following amendments and revisions:

- (a) First Minor Permit Revision No.: 127-12978-00094, issued on May 1, 2001,
- (b) First Administrative Amendment No.: 127-14313-00094, issued on June 28, 2001,
- (c) Second Minor Permit Revision No.: 127-14750-00094, issued on September 25, 2001,
- (d) First Reopening No.: 127-13097-00094, issued on September 27, 2001,

- (e) First Significant Permit Revision No.: 127-16841-00094, issued on March 10, 2003,
- (f) Second Administrative Amendment No.: 127-18001-00094, issued on August 25, 2003, and
- (g) Third Administrative Amendment No.: 127-17298-00094, issued on December 15, 2003.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this FESOP. The following terms and conditions have been revised:

- (a) First Minor Permit Revision 127-12978-00094 issued on May 1, 2001

Condition D.1.1 limited the particulate emissions from both boilers to 0.395 pounds per million British thermal units of heat input pursuant to 326 IAC 6-2-4.

Reason revised: Pursuant to 326 IAC 6-2-4, the PM emissions from both boilers, identified as EU 001 and EU 013, constructed in 1999 and 2001, respectively, shall each be limited to 0.413 pounds per million British thermal units heat input.

- (b) First Minor Permit Revision 127-12978-00094 issued on May 1, 2001

Condition D.2.1 limited the VOC emissions from coatings, dilution solvents and cleaning solvents to less than 23.7 tons per year has been revised to a limit of 23.1 tons per year.

Reason revised: The VOC limit in the First Minor Permit Revision 127-12978-00094 did not ensure that the source-wide VOC emissions were limited to less than twenty five (25) tons per year. Therefore, the VOC emission limit from the coatings, dilution solvents and cleaning solvents has been reduced from 23.7 tons per year to 23.1 tons per year to keep the source a minor source pursuant to Emission Offset, 326 IAC 2-3. The revision of this limit was necessary to limit the VOC emissions from the entire source to less than twenty five (25) tons per year taking into account the limited potential to emit VOC from the two (2) boilers, the insignificant natural gas combustion and the VOC estimated emissions from the other insignificant activities.

- (c) Second Minor Permit Revision No.: 127-14750-00094, issued on September 25, 2001,

Condition D.1.7 required visible emissions notations of the exhausts from the boilers once per shift when burning fuel oil.

Reason revised: IDEM has determined that once per day monitoring of the visible emission notations is generally sufficient to ensure proper operation of the boilers when burning fuel oil. IDEM has also determined that monitoring this parameter once per day is sufficient to satisfy the requirements of the FESOP rules.

- (d) Third Administrative Amendment No.: 127-17298-00094, issued on December 15, 2003.

Condition D.3.6 required visible emissions notations once per shift.

Reason revised: IDEM has determined that once per day monitoring of the control device (or of visible emission notations) is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the FESOP rules.

- (e) Third Administrative Amendment No.: 127-17298-00094, issued on December 15, 2003.

Condition D.3.7 required baghouse and cyclone inspections of the baler system.

Reason not incorporated: IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable Preventive Maintenance Plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirements to keep records of the inspections have also been removed.

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the previous FESOP:

- (a) The primary purpose of the cyclone is to operate pneumatically, separate trimmings from the air stream and convey the trimmings to the baler.
- (b) The baler system can not operate without the cyclone since the cyclone is the mechanism by which the material is routed to the baler.
- (c) The baled trimmings are sold to mills to make paper. Jet Corr receives approximately \$60 per ton which corresponds to a saving of more than \$750,000 per year based on the 6,400 pound per hour throughput and their annual hours of operation.

IDEM, OAQ evaluated the above justifications and agreed that the cyclone whose primary purpose is to pneumatically convey trimmings to the baler will be considered as an integral part of the baler system. Therefore, the potential-to-emit PM and PM₁₀ will be determined after the cyclone, i.e., the potential-to-emit before and after the cyclone is the same. Operating conditions in the proposed permit will specify that this cyclone shall operate at all times when the baler system is in operation.

Note that even though IDEM OAQ agrees that the cyclone is an integral part of the baler system, the cyclone is still considered a particulate control device. The baghouse, installed in 2003, is not considered, or claimed by Jet Corr to be, integral to the baler system.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on July 2, 2004. Additional information was received on July 13, 2004.

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

Emission Calculations

See pages 1 - 6 of Appendix A of this document for detailed emission calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in this FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	145
PM ₁₀	145
SO ₂	93.0
VOC	72.0
CO	29.2
NO _x	43.0

HAPs	Unrestricted Potential Emissions (tons/yr)
Worst Case Unspecified* HAPs from Printing & Corrugating Machines	31.1
Benzene	0.0007
Dichlorobenzene	0.0004
Formaldehyde	0.026
Hexane	0.627
Toluene	0.001
Lead Compounds	0.002
Cadmium Compounds	0.0009
Chromium Compounds	0.001
Manganese Compounds	0.001
Nickel Compounds	0.001
Arsenic Compounds	0.0007
Beryllium Compounds	0.0005
Mercury Compounds	0.0005
Selenium Compounds	0.003
Total	31.8

* The HAPs are unspecified because they originate from many different varieties of inks. The potential to emit HAPs conservatively assumed that the worse case inks, in terms of HAPs content, were applied by all the printer-folder-gluer machines for a full 8,760 hours per year.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than twenty-five (25) tons per year for this source located in Porter County, and the potential to emit PM₁₀ is greater than one hundred (100) 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.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) 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 2-7-1(29)) 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.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Printing/gluing operations EUs 003, 004, 005, 012, 018 and 019 and two corrugating machines EU 006 (insignificant activity).	-	-	-	23.1	-	-	Total Less Than 10
Two (2) dual fuel boilers EUs 001 and 013, worst case & limited	0.646	1.53	12.5	0.988	15.1	11.3	
Baler system EU 009	28.0	28.0	-	-	-	-	
Natural gas combustion (Insignificant activity)	0.253	1.01	0.080	0.733	11.2	13.3	
Other insignificant activities	2.00	1.00	-	0.100	-	-	
Total Emissions	30.9	31.5	12.6	24.9	26.3	24.6	Total Less Than 10

- (a) NO_x emissions from the entire source are limited to less than twenty five (25) tons per year as follows:
 - (1) Fuel oil combustion to the two (2) boilers is limited to 350.0 kilogallons per twelve (12) consecutive month period, equivalent to NO_x emissions of 3.50 tons per year.

The full fuel oil limit for the two (2) boilers is equivalent to utilizing fuel oil for 13.37% of the year. This allows the boilers to run on natural gas for the remainder of the year, 86.63% of the year. Using natural gas for 86.63% of the annual hours is equivalent to NO_x emissions of 7.78 tons per year.

- (2) The space heaters and AMUs (insignificant activities) are limited to a total of 266.45 million cubic feet of natural gas per twelve (12) consecutive month period. This limit will be met by not operating any of the space heaters and AMUs during June, July and August. The 266.45 million cubic feet of natural gas throughput limit is equivalent to operating 79.1% of the year. Not operating during June, July and August is equivalent to a maximum of 74.8% of the year. Therefore, by not operating during June, July and August, the source will comply with the natural gas usage limit. The operation of the space heaters and AMUs for 79.1% of the year is equivalent to limited NO_x emissions of 13.3 tons per year.
- (3) Therefore, the total source-wide NO_x emissions are limited to $3.50 + 7.78 + 13.3 = 24.6$ tons per year.

(b) VOC

The total input of VOC applied to the applicators for the printing, gluing and corrugating operations is limited to less than 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month year. This limits the VOC emissions from the entire source to less than twenty five (25) tons per year after considering the VOC emissions from the worst case, limited, combustion. Note that for the dual-fueled boilers, the worst case VOC emissions are for the boilers utilizing natural gas 100% of the time, equivalent to VOC emissions of 0.988 tons per year.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM _{2.5}	nonattainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	severe nonattainment
8-Hour Ozone	moderate nonattainment
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.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC

emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Porter County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability - Entire Source section of this document.

- (2) VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section of this document.
- (c) Porter County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO and lead . Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) 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.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	30.9
PM ₁₀	31.5
SO ₂	12.6
VOC	24.6
CO	26.3
NO _x	24.6
Single HAP	Less Than 10
Combination HAPs	Less Than 10

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories, no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater and no severe nonattainment regulated pollutants are emitted at a rate of twenty five (25) tons per year or greater.

Federal Rule Applicability

- (a) This source consists of boilers that are rated at greater than ten (10) million British thermal units per hour each, constructed in 1999 and 2001. Therefore, these boilers are subject to the New Source Performance Standard, 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The specific facilities include the following:

- (1) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 001, installed in 1999, rated at 20.92 million British thermal units per hour, exhausted through Stack S001.
- (2) One (1) natural gas-fired low NO_x boiler with No. 2 fuel oil as backup, identified as EU 013, installed in 2001, rated at 20.92 million British thermal units per hour, exhausted through Stack S002.

Non applicable portions of the NSPS will not be included in the permit. These boilers are subject to the following portions of Subpart Dc.

- (A) 60.40c
- (B) 60.41c
- (C) 60.42c(d), (e)(2), (g), (h)(1), (i) and (j)
- (D) 60.44c(a), (b), (c), (d), (e), (f)(2), (g), (h), (i) and (j)
- (E) 60.46c(d), (e) and (f)
- (F) 60.48c(a), (b), (d), (e)(1 - 7, 11), (f)(1), (g), (h), (i) and (j)

The provisions of 40 CFR 60 Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 60 Subpart Dc.

- (b) The requirements of Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60.430, Subpart QQ are not included in the permit for any of the printer-folder-gluer machines since the machines are all flexographic rather than rotogravure equipment.
- (c) The requirements of Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60.440, Subpart RR are not included in the permit for any of the printer-folder-gluer machines since these facilities do not manufacture pressure sensitive tapes or labels.
- (d) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60 Subpart Kb) are not included in the permit for the above-ground, 1,000 gallon, No. 2 fuel

oil storage tank, identified as EU 002, constructed after July 23, 1984 because the capacity of this tank is less than 75 cubic meters and was installed in 1999.

- (e) There are no other New Source Performance Standards (NSPS) included in the permit for this source.
- (f) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63.820, Subpart KK are not included in the permit because HAPs are limited to below the major source levels. The total HAPs from the entire source shall still be limited to less than ten (10) tons per year.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD are not included in the permit for this source. The source is not a major source of HAPs, this source is not an affected source and, therefore, the requirements of Subpart DDDDD are not included in the permit for this source.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR Part 63.460, Subpart T, are not included in the permit for the insignificant degreasing operation, because this operation does not use a halogenated solvent as specified in 40 CFR Part 63, Subpart T.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

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

The unrestricted potential to emit for each of the attainment regulated pollutants is less than two hundred fifty (250) tons per year. Therefore, this is a minor source pursuant to the 326 IAC 2-2, PSD rules.

326 IAC 2-3 (Emission Offset)

- (a) Pursuant to AAF 127-14213 issued June 28, 2001, low NO_x burners shall be required on the source's boilers. Also, the total fuel oil consumption to the two (2) boilers will be limited to 350.0 kilogallons per year.

The natural gas usage from the two (2) boilers does not have to be limited because the No. 2 fuel oil consumption is limited to the equivalent of 13.37% of the potential hours of operation and if natural gas was consumed for all of the remaining 86.63% of the hours, the total source-wide NO_x emissions will still be less than twenty-five (25) tons per year. If natural gas is burned for all hours of the year (8,760) in the boilers, the total potential NO_x emissions would be less than that from the combination of the limited No. 2 fuel oil and natural gas combustion.

- (b) None of the insignificant activity natural gas fired space heaters, including the air makeup units and the unit heaters, shall be operated during the months of June, July and August of each year. This operational limitation shall limit the total potential natural gas consumption to less than 266.45 million cubic feet per year.
- (c) The limits in (a) and (b) above ensure that the entire source shall be less than twenty-five (25) tons per year of NO_x and therefore the requirements of this rule are not applicable.

- (d) The total VOC delivered to the printing and gluing operations, shall be limited to less than 23.1 tons of VOC per year. This limit, combined with the limited potential to emit VOC from the boilers and the insignificant activities, ensures that the VOC emissions from the entire source shall be less than twenty-five (25) tons per year.
- (e) Therefore, the source-wide VOC emissions and the NO_x emissions are each limited to less than twenty five (25) tons per year and this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.
- (f) IDEM, OAQ regulates PM₁₀ emissions as a surrogate for PM_{2.5} and Porter County has been designated as a nonattainment county for PM_{2.5}. The PM₁₀ emissions from the baler system shall not exceed 8.94 pounds per hour which is equivalent to 39.2 tons per year. This will make the potential PM₁₀ emissions from the entire source less than one hundred (100) tons per year, and therefore the requirements of 326 IAC 2-3, Emission Offset are not applicable.

326 IAC 2-6 (Emission Reporting)

This source, while located in Porter County, does not have the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

- (a) The PM₁₀ emissions from the baler system shall not exceed 8.94 pounds per hour which is equivalent to 39.2 tons per year. This will make the potential PM₁₀ emissions from the entire source less than one hundred (100) tons per year.
- (b) The total VOC delivered to the printing and gluing operations, shall be limited to less than 23.1 tons of VOC per year. This limit, combined with the limited potential to emit VOC from the boilers and the insignificant activities, ensures that the entire source shall not exceed twenty-five (25) tons per year.
- (c) The total HAPs delivered to the printing and gluing operations, shall be limited to less than ten (10) tons per year. This will limit the HAPs emissions from the entire source to less than ten (10) tons per year for a single HAP and to less than twenty five (25) tons per year to the total combination of HAPs.

- (d) The limits in (a) through (c) above will ensure that the source complies with the requirements of 326 IAC 2-8-4.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4, the PM emissions from both boilers, identified as EU 001 and EU 013, constructed in 1999 and 2001, respectively, shall each be limited to 0.413 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units heat input = 41.84. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

The PM emissions on fuel oil from each boiler are 1.31 tons per year as shown on page 5 of Appendix A. This is equivalent to 0.299 pounds per hour which is equivalent to 0.014 pounds per million British thermal units of heat input for each of the two (2) boilers rated at 20.92 million British thermal units per hour. Therefore, both boilers comply with this rule.

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

Pursuant to 326 IAC 6-3-2, the particulate from the baler system, identified as EU 009, equipped with a cyclone and a baghouse, shall be limited to 8.94 pounds per hour operating at a process weight rate of 6,400 pounds per hour.

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:

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

The cyclone, which has been determined to be an integral part of this emission unit, as well as the baghouse installed in 2003, shall be in operation at all times the baler system is in operation, in order to comply with this limit. The potential to emit PM from the baler system from page 3 of Appendix A is 6.40 pounds per hour, which complies with the 8.94 pounds per hour limit pursuant to the rule.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-2(a)(3) (SO₂ Emissions Limitations) when No. 2 fuel oil is burned, the SO₂ emissions from boilers, identified as EU 001 and EU 013, shall not exceed 0.5 pounds per million British thermal units of heat input for No. 2 fuel oil combustion.

Based upon the calculations on Page 5 of Appendix A, the SO₂ emissions from the two (2) identical boilers are 10.6 pounds per hour which is equivalent to 0.5 pounds per million British thermal units of heat input. Therefore, both boilers are in compliance with 326 IAC 7-1.1-2(a)(3).

326 IAC 8-5-5 (Graphic arts operations)

Pursuant to 326 IAC 8-5-5(a)(3)(B), the source located in Porter County with limited potential to emit VOCs of greater than ten (10) tons per year and less than twenty-five (25) tons per year, shall comply with the requirements of 326 IAC 8-7-2(c) that requires compliance with 326 IAC 8-7-6 and 326 IAC 8-1-9(b). These rules require the following:

- (a) Pursuant to 326 IAC 8-7-6, each source or facility shall submit to the IDEM, OAQ a certification that the facility is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:
 - (1) The name and address of the source and the name and telephone number of the company representative.
 - (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
 - (3) A listing of facilities which meet the requirements of section 2(a) of this rule.
 - (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
 - (5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.
- (b) Pursuant to 326 IAC 8-1-9(b), records required by 326 IAC 8-1-9 or records required to show that a source is exempt from the requirements of 326 IAC 8, shall be submitted to the IDEM, OAQ or the US EPA within thirty (30) days of the receipt of a written request.

State Rule Applicability – Insignificant Activities

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

- (a) Miscellaneous cutting torches, identified as EU 010, installed in 1999

Pursuant to 326 IAC 6-3-1(b)(10), torches that cut less than 3,400 inches per hour of stock 1 inch thick or less are exempt from the requirements of 326 IAC 6-3.
- (b) Rotary die cutters, identified as EU 008

Pursuant to 326 IAC 6-3-2, the particulate from the rotary die cutters, identified as EU 008, shall not exceed an amount determined by the following:

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

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

(c) Starch silo

Pursuant to 326 IAC 6-3-2, the particulate from the starch silo shall not exceed an amount determined by the following:

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

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

(d) Two (2) paper corrugating machines

The two (2) paper corrugating machines do not emit particulate and therefore are exempt from the requirements of 326 IAC 6-3 pursuant 326 IAC 6-3-1(b)(14).

326 IAC 8-3-2 (Cold cleaner operation)

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

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

326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch)

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

Testing Requirements

The baler system was required to be PM stack tested by September 10, 2003, as specified in SPR 127-16841-00094, issued on March 10, 2003, to verify compliance with 326 IAC 6-3-2. The

initial stack test conducted on August 28, 2003 did not indicate compliance with the PM limit of 8.94 pounds per hour. A baghouse PM control device was added to the baler system as permitted by the Third Administrative Amendment No.: 127-17298-00094, issued on December 15, 2003. With the added baghouse control, an IDEM accepted stack test was completed on July 22, 2004. This test indicated a PM emission rate of 4.42 pounds per hour at a production rate of 6,124 pounds per hour. Scaling the production rate up to the full 6,400 pounds an hour is equivalent to an emission rate of $6,400/6,124$ pounds per hour x 4.42 pounds of PM per hour which is equal to 4.62 pounds of PM per hour. This test verified compliance with the 326 IAC 6-3-2 allowable particulate emission rate of 8.94 pounds per hour.

The baghouse as well as the integral cyclone controls will be required to be operated at all times that the baler system is in operation.

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:

- (a) The baler system, identified as EU 009 has applicable compliance monitoring conditions as specified below:
 - (1) Visible emissions notations of the baler system exhausted to Stack S003 or back into the building shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) The Permittee shall record the pressure drop across the baghouse used in conjunction with the baler system, at least once per day when the baler system is

in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the cyclone and baghouse for the baler system must operate properly to ensure compliance with 326 IAC 2-3, 326 IAC 5-1, 326 IAC 6-3 and 326 IAC 2-8 (FESOP).

- (b) The two (2) boilers, identified as EU 001 and EU 013, have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the two (2) boiler stacks S001 and S002 shall be performed once per day during normal daylight operations when burning No. 2 fuel oil. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the boilers when burning No. 2 fuel oil must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-2-4 and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this corrugated box manufacturing source shall be subject to the conditions of the **FESOP 127-19359-00094**.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Jet Corr, Inc.
Source Location: 3155 State Road 49, Valparaiso, Indiana 46383
County: Porter
FESOP: F 127-19359-00094
SIC Code: 2653
Permit Reviewer: Frank P. Castelli

On December 15, 2005 the Office of Air Quality (OAQ) had a notice published in the Chesterton Tribune, Valparaiso, Indiana, stating that Jet Corr, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a corrugated box manufacturing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

On January 18, 2006, David R. Jordan, P.E. of ERM submitted comments on behalf of Jet Corr, Inc. on the proposed FESOP Renewal. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Condition D.2.4(a) – This condition requires that the cyclone and baghouse used for particulate matter control on the baler be operated at all times. The normal operating scenario for this equipment is the use of both the cyclone and baghouse, with exhaust from the baghouse directed back inside the plant.

Jet Corr did, however, perform a stack test on 22 July 2004 which demonstrated that compliance with the applicable particulate matter emission rate could be attained without the use of the baghouse. As a result, Jet Corr requests that the wording in this condition be revised as follows:

“In order to comply with Conditions D.2.1 and D.2.2, the cyclone ~~and baghouse~~ for particulate control shall be in operation....”

Response 1:

The initial stack test conducted on August 28, 2003 did not indicate compliance with the PM limit of 8.94 pounds per hour with only the cyclone. Subsequently, IDEM approved an additional stack test conducted on July 22, 2004 which verified that the baler system could meet all applicable PM and PM₁₀ emission limits with the use of the cyclone alone. Therefore, Condition D.2.4(a) has been revised and Condition D.2.4(b) has been deleted as follows:

D.2.4 Particulate Control

(a) In order to comply with Conditions D.2.1 and D.2.2, the cyclone ~~and baghouse~~ for particulate control shall be in operation and control emissions from the baler system at all times that the baler system is in operation.

(b) ~~In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of~~

~~the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

Comment 2:

Condition D.2.5(a) – This condition requires visible emission notations of the exhaust from the baler. As described above, the normal operating configuration for this equipment involves the use of the cyclone and baghouse, with exhaust from the baghouse directed inside the plant. It is Jet Corr's understanding that the Indiana Department of Environmental Management (IDEM) does not require visible emission notations for inside exhausts. Consequently, Jet Corr requests that the wording of this condition be changed as indicated below:

"Visible emission notations of the baler system stack exhaust S003 shall be performed during normal daylight operations once per day ~~when the baler system is in operation and exhausting outside the building.~~"

Response 2:

Condition D.2.5(a) has been revised as follows to indicate that visible emission notations do have to be performed when the baler system is exhausted through Stack S003, but not when the emissions from the baler system are exhausted back into the building.

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the baler system stack exhaust S003 shall be performed during normal daylight operations once per day **when the baler system is in operation and exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

Comment 3:

Condition D.2.6 – This condition requires pressure drop monitoring across the baghouse for the baler once per day. Jet Corr does not believe that such monitoring is typically required for baghouses which exhaust inside the building. Jet Corr requests that the wording for this condition be changed as follows:

"The Permittee shall record the pressure drop across the baghouse used in conjunction with the baler system at least once per day ~~when the baler system is in operation and exhausting outside the building.~~"

Response 3:

Since the baghouse is not required to be operated to comply with the emission limitations, Conditions D.2.6 and D.2.7 have been deleted and the record keeping requirements in Condition D.2.9 (now D.2.7) have been revised. Condition D.2.8 (now D.2.6) "Cyclone Failure Detection" has been retained, unaltered, as a compliance monitoring condition regarding the operation of the cyclone since the cyclone for particulate control shall be in operation and control emissions from the baler system at all times that the baler system is in operation. The changes are as follows:

D.2.6 Baghouse Parametric Monitoring

- (a) ~~The Permittee shall record the pressure drop across the baghouse used in conjunction with the baler system at least once per day when the baler system is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or~~

~~Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

- ~~(b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

~~D.2.7 Broken or Failed Bag Detection~~

- ~~(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

- ~~(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.~~

~~D.2.8 D.2.6 Cyclone Failure Detection~~

~~D.2.9 D.2.7 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the baler system stack exhaust S003 once per day **when the baler system is in operation and exhausting to the atmosphere.**~~
- ~~(b) To document compliance with Condition D.2.6, the Permittee shall maintain records once per day of the pressure drop during normal operation.~~
- ~~(c)(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Comment 4:

Condition D.3.10 – This condition incorporates New Source Performance Standard (NSPS) language pertaining to small natural gas/#2 fuel oil boilers at the facility. The only portion of the NSPS which is applicable to the boilers relates to limitations on the sulfur content of fuel oil, which is already addressed in Conditions D.3.5 and D.3.7. Jet Corr does not believe it is necessary to include the language copied from the NSPS under this condition (on pages 33 through 39 of the proposed permit), and requests that it be removed.

Response 4:

Conditions D.3.9 and D.1.10 are included in the permit due to the applicability of the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc. Condition D.3.9 cites the applicable general provisions. Condition D.3.10 contains the requirements of the rule that are applicable to the source. The language in Condition D.3.10 is the exact language from the New Source Performance

Standard, 40 CFR 60, Subpart Dc, but only includes those portions of the rule applicable to the facilities at this source, with the exception of 40 CFR 60.41c, Definitions, which is included in its entirety. IDEM, OAQ, prefers that the permit language reflect the exact language in the federal rule to minimize lawsuits due to discrepancies between the federal rule language and the permit language. For clarity, Condition D.3.9 has been revised as follows:

D.3.9 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR Part 60.40c, the Permittee shall comply with the provision of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1 for the two (2) boilers, identified as EU 001 and EU 013, as specified in Appendix A of 40 CFR Part 60, Subpart Dc in accordance with the schedule in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

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

Change 1:

The citations in Condition C.13 and the record keeping and reporting heading in Section D.4 have been corrected as follows:

C.13 Instrument Specifications [326 IAC 2-1.1-11] [~~326 IAC 2-7-5(3)~~] [~~326 IAC 2-7-6(1)~~] [**326 IAC 2-8-4(3)**] [**326 IAC 2-8-5(1)**]

Record Keeping and Reporting Requirements [326 IAC 2-8-5(3)] [~~326 IAC 2-8-4916~~]

Change 2:

In Condition D.1.7(b), the word require has been changed to past tense, required as follows:

D.1.7 Reporting Requirements [326 IAC 8-5-5] [326 IAC 8-7-6] [326 IAC 8-1-9(b)]

(b) Pursuant to 326 IAC 8-1-9(b), records **required** by 326 IAC 8-1-9 or records required to show that a source is exempt from the requirements of 326 IAC 8, shall be submitted to the IDEM, OAQ or the U.S. EPA within thirty (30) days of the receipt of a written request.

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

**Company Name: Jet Corr, Inc.
Address City IN Zip: 3155 State Road 49, Valparaiso, Indiana 46383
FESOP Renewal: F 127-19359
Plt ID: 127-00094
Reviewer: Frank P. Castelli
Application Date: July 2, 2004**

94.5-inch Emba Press, EU 005

THROUGHPUT								
Press I.D. EU 005	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR	MMin ² /HR
	957	12	94.5	60	8760	1000000	570401.0928	65.1

INK						
Press Id	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
EU 005						
Worst Case VOC	1.5	2%	100.00%	570401	2000	8.56
INK HAPs						
Worst Case HAP	1.5	1%	100.00%	570401	2000	4.28

METHODOLOGY For Presses And Gluer Machines

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%; NON HEAT SET FLASH OFF = 5%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

EU 003 & 004 48-inch Color Flexo Folder & Gluer Machines

TOTAL THROUGHPUT							
Total							
Press I.D. EU 003 & EU 004	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR
	2500	12	48	60	8760	1000000	756864

INK						
Press Id	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
EU 003 & EU 004						
Worst Case VOC	1.5	2%	100.00%	756864	2000	11.35
INK HAPs						
Worst Case HAP	1.5	1%	100.00%	756864	2000	5.68
Adhesives						
Worst Case VOCs						
XR-6463 PN	0.124	10.03%	100.00%	756864	2000	4.69
XR-6463 RE	0.191	13.22%	100.00%	756864	2000	9.58
PA-3501 RB	0.129	0.55%	100.00%	756864	2000	0.269
Cleaning Solvent	0.022	11.00%	100.00%	756864	2000	0.927
					Total VOC	26.8
Adhesives HAPs						
Worst Case						
XR-6463 PN	0.124	10.03%	100.00%	756864	2000	4.69
XR-6463 RE	0.191	10.03%	100.00%	756864	2000	7.27
PA-3501 RB	0.129	0.025%	100.00%	756864	2000	0.012
Cleaning Solvent	0.022	0.00%	100.00%	756864	2000	0.000
					Total HAPs	17.64

EU 012 2-Color Flexographic Folder & Gluer Machine

TOTAL THROUGHPUT	Total						
Press I.D. EU 012	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR
	1708.33	12	89	60	8760	1000000	958957

INK						
Press Id EU 012	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Worst Case VOC	0.93	1.8%	100.00%	958957	2000	8.03
INK HAPs						
Worst Case HAP	0.93	1%	100.00%	958957	2000	4.46
Adhesives						
Worst Case VOC	0.523	0.52%	100.00%	958957	2000	1.31
Total VOC						9.33

EU 018 Flexographic Printer-Folder Gluer Machine

TOTAL THROUGHPUT	Total							
Press I.D. EU 018	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR	MMin ² /hr
		12		60	8760	1000000	693792.0	79.2

INK						
Press Id EU 018	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Worst Case VOC	0.93	1.8%	100.00%	693792.0	2000	5.81
INK HAPs						
Worst Case HAP	0.0015	100%	100.00%	693792	2000	0.520
Adhesives						
Worst Case VOC	0.523	0.63%	100.00%	693792	2000	1.14
Total VOC						6.95

EU 019 Flexographic Model 170 Printer-Folder Gluer Machine

THROUGHPUT								
Press I.D. EU 019	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR	MMin ² /HR
	925	12	94.5	60	8760	1000000	551328.1200	62.9

INK						
Press Id	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
EU 005						
Worst Case VOC	1.5	2%	100.00%	551328	2000	8.27
INK HAPs						
Worst Case HAP	1.5	1%	100.00%	551328	2000	4.13

2 CORRUGATING MACHINES							
EU 006	CAPACITY SQUARE FEET PER HOUR	CONVERT FEET TO SQUARE INCHES PER HOUR	CAPACITY SQUARE INCHES PER HOUR	HOUR PER HOUR	8760 HR YEAR	1/1000000	MMin ² /YR
EU 006	328768	144	47342592	1	8760	1000000	414721

Capacity = 164,384 sq ft/hr each

MATERIALS VOCS						
Materials	Maxium Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
2 CORRUGATING MACHINES						
B121 Biocide	7.72E-03	0.50%	100.00%	414721	2000	0.00800
210 Resin	2.08E-02	1.00%	100.00%	414721	2000	0.043
#677 Colloids	7.72E-03	0.185%	100.00%	414721	2000	0.0030
Cleanup Solvent	4.82E-02	100.00%	100.00%	414721	2000	10.00
					Total VOC	10.1
MATERIAL HAPS						
B121 Biocide	7.72E-03	1.00%	100.00%	414721	2000	0.01600
210 Resin	2.08E-02	0.00%	100.00%	414721	2000	0.000
#677 Colloids	7.72E-03	0.000%	100.00%	414721	2000	0.00000
Cleanup Solvent	4.82E-02	0.00%	100.00%	414721	2000	0.00
					Total HAPs	0.016

SUMMARY OF PROCESS VOCS & HAPS

Emission Unit	VOC (tons/year)	Worse Case HAP (tons/year)
EU 005	8.56	4.28
EU 003	13.4	8.82
EU 004	13.4	8.82
EU 012	9.33	4.46
EU 018	6.95	0.520
EU 019	8.27	4.13
EU 006	10.1	0.016
Subtotal	70.0	31.1

Baler System EU 009

The cyclone was determined to be integral part of the process by SPR 127-16841-00094, issued on March 10, 2003.
The potential to emit after control takes into account the baghouse control which brings the overall control to 99.9%.

6,400 lbs of scrap per hour processed			After baghouse	lbs/hr	6.40
PTE after cyclone = 99.5%	PTE after cyclone = 6,400 lbs/hr * (1- 0.995) =		Control	tons/yr	28.0
PM is assumed to equal PM10	PM = PM10				
					140.2 tons/yr

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

Company Name: Jet Corr, Inc.
Address City IN Zip: 3155 State Road 49, Valparaiso, Indiana 46383
Permit Number: F 127-19359
Plt ID: 127-00094
Reviewer: Frank P. Castelli
Application Date: July 2, 2004

Low NOx

Boilers EU 001 & EU 013

Each Boiler Rated
 Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMBtu/yr

20.92

180

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	50 **see below	5.50	84.0
Potential Emission in tons/yr	0.171	0.683	0.054	4.49	0.494	7.55
Subtotal for Both Boilers in tons/yr	0.341	1.37	0.108	8.98	0.988	15.1
Limited Subtotal for Both Boilers in tons/yr	0.296	1.18	0.093	7.78	0.856	13.1

Utilization factor for natural gas = 100% - max. oil utilization of 13.37% = 100% - 13.37% = 86.63% See fuel oil calculations for details.

Insignificant Combustion

6 AMUs and 18 Unit Heaters

Total Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMBtu/yr

Limited Throughput

MMCF/yr 266.5

Insig. Combustion

39.23

337

Source agreed not operate the AMUs and heaters during June, July and August. This is a utilization factor of 74.8%. The required natural gas throughput limit of 266.45 MMCF/year is 79.1% of the potential usage (266.45/337) = 79.1%. So the source will comply with this limit by not operating during the months of June, July and August.

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.320	1.28	0.101	16.8	0.927	14.2
Limited Emission in tons/yr	0.253	1.01	0.080	13.3	0.733	11.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Total Boilers & Insig Combustion

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000731	0.000418	0.026109	0.626623	0.001184

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00017	0.00038	0.00049	0.00013	0.00073	0.657

Methodology is the same as page X.

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

No. 2 Fuel Oil Combustion Only

Boilers EU 001 & EU 013

Each Boiler Rated
Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.500

Limited Throughput
kgals/year

20.92

1309 each boiler

350 Total For Both

Pollutant					
Emission Factor in lb/kgal	PM* 2.00	SO2 71.0 (142.0S)	NOx 20.0	VOC 0.340	CO 5.00
Potential Emission in tons/yr	1.31	46.5	13.1	0.223	3.27
Subtotal for Both Boilers in tons/yr	2.62	92.9	26.2	0.445	6.54
Limited Subtotal for Both Boilers in tons/yr	0.350	12.4	3.50	0.060	0.875

Utilization factor = $(350 / (2 \times 1309)) \times 100 = 13.37\%$

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

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

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

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

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

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 0.000004	Beryllium 0.000003	Cadmium 0.000003	Chromium 0.000003	Lead 0.000009
Potential Emission in tons/yr	0.0007	0.0005	0.0005	0.0005	0.0016

HAPs - Metals (continued)					
Emission Factor in lb/mmBtu	Mercury 0.000003	Manganese 0.000006	Nickel 0.000003	Selenium 0.000002	Total
Potential Emission in tons/yr	0.0005	0.0011	0.0005	0.0027	0.009

Methodology

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

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

Summary Potential to Emit Worst Case Both Boilers on Oil or Natural Gas Before Limits

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Subtotal on Gas Both Boilers in tons/yr	0.341	1.37	0.108	8.98	0.988	15.1
Subtotal on Oil for Both Boilers in tons/yr	2.62	2.62	92.9	26.2	0.445	6.54
Worse Case on Oil or Natural Gas in tons/yr	2.62	2.62	92.9	26.2	0.988	15.1
Insignificant Activity on Nat. Gas in tons/yr	0.320	1.28	0.101	16.8	0.927	14.2
Total	2.94	3.90	93.0	43.0	1.91	29.2

Summary Potential to Emit Worst Case Both Boilers on Oil or Natural Gas After Limits

	PM	PM10	SO2	NOx	VOC	CO
Limited Worst Case Boilers in tons/yr	0.646	1.53	12.5	11.3	0.988	15.1
Limited Insignif. Activities in tons/yr	0.253	1.01	0.080	13.3	0.733	11.2
Total	0.899	2.55	12.6	24.6	1.72	26.3