

TO: Interested Parties / Applicant

FROM: Felicia A. Robinson,
Manager of Environmental Planning

RE: Vista Packaging Corporation/ Exemption # 097-19989-00369

Notice of Decision - Approval

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

If you wish to challenge this decision, IC 4-21.5-3 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, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing 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); or
- (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, the name of the applicant, location, the date of this notice, and the following:

- (1) the name and address of the person making the request; and
- (2) the interest of the person making the request; and
- (3) identification of any persons represented by the person making the request; and
- (4) the reasons, with particularity, for the request; and
- (5) the issues, with particularity, proposed for consideration 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 Environmental Services, Permits Section at (317) 327-2234.

Enclosures

VIA CERTIFIED MAIL 7000 0600 0023 5187 9321

August 23, 2005

Tim Rolfsen
Vista Packaging Corporation
7915 East 30th Street
Indianapolis, IN 46219

Dear Mr. Rolfsen:

Re:Exempt Operation Status **097-19989-00369**

The application from Vista Packaging Corporation relating to the operation of a stationary paper coating and packaging materials source, received on March 23, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1-1, it has been determined that the following operation at Vista Packaging Corporation located at 7915 East 30th Street, Indianapolis, Indiana 46219 is classified as exempt from air pollution permit requirements:

- (a) One (1) Sakurai Maestro SC 101A coating operation, identified as EU#1, exhausting to stack 001; and
- (b) The following insignificant support operations: a coating storage area, a screen preparation and cleaning area, laminating and foil stamping operations, gluing and folding operations, and a die cutting, perforating, embossing, and shrink wrapping operation, exhausting to stack 004.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour: Ceiling heaters with a combined maximum heat input capacity of 5.0 million British thermal units (MMBtu) per hour.

The following conditions shall be applicable:

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 15 minutes (60 readings) in a 6-hour period 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.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES), if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Felicia A. Robinson
Manager of Environmental Planning

SR/EVP

cc: File – Marion County Health Department
Air Compliance – Matt Mosier
IDEM, OAQ- Mindy Hahn

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Vista Packaging Corporation
Source Location:	7915 East 30th street, Indianapolis, Indiana 46219
County:	Marion
SIC Code:	2670
Exemption No.:	097-19989-00369
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed an application from Vista Packaging Corporation relating to the operation of a stationary paper coating and packaging materials operation.

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

- (a) One (1) Sakurai Maestro SC 101A coating operation, identified as EU#1, exhausting to stack 001;
- (b) The following insignificant support operations: a coating storage area, a screen preparation and cleaning area, laminating and foil stamping operations, gluing and folding operations, and a die cutting, perforating, embossing, and shrink wrapping operation, exhausting to stack 004; and
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Ceiling heaters with a combined maximum heat input capacity of 5.0 million British thermal units (MMBtu) per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The following permitted emission units and pollution control devices have been removed from the source:

- (a) One (1) Sakurai Maestro SC 101B coating operation, identified as EU#2, exhausting to stack 002; and
- (b) One (1) Harris Coater coating operation, identified as EU#3, exhausting to stack 003.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 097-11648-00369 issued on March 13, 2000;
- (b) First Minor Permit Revision 097-13677-00369 issued on January 25, 2001; and
- (c) Notice only change 097-19362-00369 issued on September 21, 2004.

None of the conditions from previous approvals were incorporated into this exemption because the level of permitting has changed as a result of removal of the following equipment:

- (a) One (1) Sakurai Maestro SC 101B coating operation, identified as EU#2, exhausting to stack 002; and
- (b) One (1) Harris Coater coating operation, identified as EU#3, exhausting to stack 003.

With the remaining equipment at the source, the source will emit less than (See Appendix A, Page 1 for emission calculations):

- (a) Five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM10).
- (b) Ten (10) tons per year of sulfur dioxide (SO₂).
- (c) Ten (10) tons per year of nitrogen oxides (NO_x).
- (d) Ten (10) tons per year of volatile organic compounds (VOC).
- (e) Twenty-five (25) tons per year of carbon monoxide (CO).
- (f) One (1) ton per year of a single hazardous air pollutant (HAP) or two and one-half (2.5) tons per year of any combination of HAPs listed pursuant to Section 112(b) of the CAA.

Therefore, pursuant to 326 IAC 2-1.1-3 (Exemptions), the source is exempt from the registration and any other permitting requirements.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on March 23, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

Potential To Emit

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

Pollutant	Potential to Emit (tons/yr)
PM	0.04
PM-10	0.17
SO ₂	0.01
VOC	0.78
CO	1.84
NO _x	2.19

HAPs	Potential to Emit (tons/yr)
Total Haps	0.81

The potential to emit as defined in 326 IAC 2-1.1-1 (16) of PM-10, VOC, SO₂, CO, NO_x, a single HAP, and the combination of HAPs are less than 5, 10, 10, 25, 10, 1, and 2.5 tons per year, respectively. Therefore, pursuant to 326 IAC 2-5.1-1(1), this source is exempt from the requirement to obtain a registration or permit. (See Appendix A, Page 1 for emission calculations).

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	Nonattainment
PM-10	Unclassifiable
SO ₂	Maintenance Attainment
NO _x	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

- (c) Marion County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emission
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 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	0.00
PM-10	0.00
SO ₂	0.00
VOC	35.8
CO	0.00
NO _x	0.00
Single HAP	7.80
Combination HAPs	20.2

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on MSOP 097-11648-00369, issued on March 13, 2000.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on the information provided by the source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart QQ) are not included in the exemption for the printing operation because the printing operation is not a publication rotogravure printing press.

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK are not included in the exemption for the printing operation because the printing operation is not publication rotogravure, packaging rotogravure or wide-web flexographic printing press.

State Rule Applicability – Entire Source

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

Although the source was constructed after the August 7, 1977 PSD rule applicability date, it is not considered a major source because it does not have the potential to emit 250 tons per year or more of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 do not apply.

326 IAC 2-3 (Emission Offset)

- (a) The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as nonattainment. Since this source is located in Marion County, which is designated as non-attainment for the 8-hour ozone standard, the applicability threshold for 326 IAC 2-3 (Emission Offset) is 100 tons per year for VOC and NOx. Since the source wide potential VOC and NOx emissions are less than 100 tons per year, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Marion County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Vista Packaging Corporation has an uncontrolled potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). There are no facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs that have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is an exempt source and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting).

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a PTE VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. No facility at this source has a PTE of VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 is not applicable to this source.

326 IAC 8-2-5 (Paper Coating Operations)

This rule establishes emission limitations for web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate, existing as of January 1980, which are located at sources in the counties listed in 326 IAC 8-2-1(a) and which have potential emissions of ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC. This source does not have potential VOC emissions of 100 tons per year or more. Therefore, this rule does not apply to this source.

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

The printing operation is not subject to the requirements of 326 IAC 8-5-5, because the printing operation does not involve packaging rotogravure, publication rotogravure or flexographic printing.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule is not applicable because the source was constructed after January 1, 1980. In addition, the potential VOC emissions from the source were, and continue to be, less than 100 tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Marion County. Therefore, this rule is not applicable to this source.

Conclusion

The operation of this stationary paper coating and packaging materials source shall be subject to the conditions of the attached proposed Exemption 097-19989-00369.

Appendix A: Emission Calculations

Company Name: Vista Packaging Corporation
Address City IN Zip: 7915 East 30th Street, Indianapolis, IN 46219
Exemption No.: 097-19989-00369
Reviewer: Seema Roy

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating Operations	TOTAL
PM	0.04	0.00	0.04
PM10	0.17	0.00	0.17
SO2	0.01	0.00	0.01
NOx	2.19	0.00	2.19
VOC	0.12	0.66	0.78
CO	1.84	0.00	1.84
total HAPs	negl.	0.81	0.81
worst case single HAP	negl.	0.47	0.47
		(toluene)	
Total emissions based on rated capacity at 8,760 hours/year.			
See page 2 of 6 of TSD for emission calculations from Cold Rolling Mill.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating Operations	TOTAL
PM	0.04	0.00	0.04
PM10	0.17	0.00	0.17
SO2	0.01	0.00	0.01
NOx	2.19	0.00	2.19
VOC	0.12	0.66	0.78
CO	1.84	0.00	1.84
total HAPs	negl.	0.81	0.81
worst case single HAP	negl.	0.47	0.47
		(toluene)	
Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.			

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Vista Packaging Corporation
Address City IN Zip: 7915 East 30th Street, Indianapolis, IN 46219
Exemption No.: 097-19989-00369
Reviewer: Seema Roy**

Coating Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Transfer Efficiency
HM703	7.34	1.00%	0.0%	1.0%	0.011000	gal/hour	0.07	0.00	0.02	0.00	0.00	100%
R40604P	8.90	0.65%	0.0%	0.7%	0.145000	gal/hour	0.06	0.01	0.20	0.04	0.00	100%
Rycolite (121000)	7.10	40.00%	0.0%	40.0%	0.050000	gal/hour	2.84	0.14	3.41	0.62	0.00	100%
Uncontrolled Potential Emissions								0.15	3.63	0.66	0.00	

METHODOLOGY

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

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Vista Packaging Corporation
Address City IN Zip: 7915 East 30th Street, Indianapolis, IN 46219
Exemption No.: 097-19989-00369
Reviewer: Seema Roy**

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Vinylacetate	Weight % Formaldehyde	Weight % Methanol	Weight % Toluene	Vinylacetate Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
HM703	7.34	0.011000	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
R40604P	8.90	0.145000	gal/hour	0.45%	0.20%	0.00%	0.00%	0.03	0.01	0.00	0.00	0.04
Rycolite (121000)	7.10	0.050000	gal/hour	0.00%	0.00%	20.00%	30.00%	0.00	0.00	0.31	0.47	0.78
Uncontrolled Potential Emissions								0.03	0.01	0.31	0.47	0.81

METHODOLOGY

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

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

**Company Name: Vista Packaging Corporation
Address City IN Zip: 7915 East 30th Street, Indianapolis, IN 46219
Exemption No.: 097-19989-00369
Reviewer: Seema Roy**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.0	43.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.19	0.12	1.84

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

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

**Company Name: Vista Packaging Corporation
 Address City IN Zip: 7915 East 30th Street, Indianapolis, IN 46219
 Exemption No.: 097-19989-00369
 Reviewer: Seema Roy**

HAPs - Organics

	Benzene	ethene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.