



*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: June 17, 2005

RE: SCA North America Packaging Division / MPM 091-20508-00079

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Mr. Robert Nicklewicz  
SCA North America Packaging Division  
955 South Woodland Avenue  
Michigan City, Indiana 46360

June 17, 2005

Re: 091-20508  
Third Minor Permit Modification to  
Part 70 Permit No.: 091-7666-00079

Dear Mr. Nicklewicz:

SCA North America Packaging Division was issued a Part 70 permit on October 14, 1999, for a stationary polystyrene shape molding operation. An application to modify the source was received by the Office of Air Quality (OAQ) on November 29, 2004. Pursuant to the provisions of 326 IAC 2-7-12(b)(1), a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of addition of one (1) natural gas fired boiler rated at 16.4 MMBtu per hour.

All other conditions of the permit shall remain unchanged and in effect. Pages added and revised in the permit are attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Adeel Yousuf, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3252, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
AY / EVP

cc: File – LaPorte County  
U.S. EPA, Region V  
LaPorte County Health Department  
Air Compliance Section Inspector – Rick Massoels  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner





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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**SCA North America Packaging Division  
955 S. Woodland Avenue  
Michigan City, Indiana 46360**

(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.

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

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 14, 1999  Expiration Date: October 14, 2004

First Administrative Amendment No.: 091-11627, issued on January 18, 2000  
First Minor Source Modification No.: 091-12933, issued on January 4, 2001;  
Second Administrative Amendment No.: 091-13602, issued on January 17, 2001;  
First Significant Source Modification No.: 091-14438, issued on November 2, 2001;  
First Significant Permit Modification No.: 091-14496, issued on November 20, 2001;  
First Permit Reopen No.: 091-13378, issued on February 13, 2002;  
Third Administrative Amendment No.: 091-15449, issued on March 20, 2002;  
Second Significant Source Modification No.: 091-15084, issued on April 3, 2002;  
Second Significant Permit Modification No.: 091-15559, issued on July 22, 2002;  
Second Minor Source Modification No.: 091-15886, issued on August 20, 2002;  
First Minor Permit Modification No.: 091-15930, issued on October 4, 2002;  
Third Minor Source Modification No.: 091-16666, issued on May 23, 2003;  
Third Significant Permit Modification No.: 091-16694, issued on July 30, 2003;  
Fourth Minor Source Modification No.: 091-18626, issued on April 6, 2004; and  
Second Minor Permit Modification No.: 091-18823, issued on July 2, 2004.

Minor Permit Modification No.: 091-20508-00079	Pages Affected: 3, 24, 25, and 28
Issued by: Original signed by Paul Dubenetzy, Branch Chief Office of Air Quality	Issuance Date: June 17, 2005

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

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

**D.1 FACILITY OPERATION CONDITIONS - One boiler rated 10.5 MMBtu/hr**

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

- D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]
- D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

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

- D.1.4 Monitoring

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

- D.1.5 Record Keeping Requirements [40 CFR part 60.48c]
- D.1.6 Reporting Requirements [40 CFR part 60.48c]

**D.2 FACILITY OPERATION CONDITIONS - Pre expanders and molding equipment**

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

- D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]
- D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]
- D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

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

- D.2.5 Record Keeping Requirements
- D.2.6 Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - One (1) boiler rated at 8.4 MMBtu/hr**

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

- D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

**Compliance Determination Requirements**

- D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

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

- D.3.3 Monitoring

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
  - (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Te documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
    - (1) Indicate estimated actual emission of all pollutants listed in 326 IAC 2-6-4(a);
    - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

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

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

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

**C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

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- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1. (constructed in 1996)
- (b) One (1) natural gas fired boiler, identified as B-3, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3. (constructed in 2005)

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

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

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

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

#### D.1.2 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the 10.5 and 16.4 MMBtu per hour boilers shall be limited to 0.6 and 0.463 pounds per MMBtu, respectively, which was determined by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Pt = Pounds of particulate matter emitted per million Btu heat input

Q = Total source maximum operating a capacity rating in million Btu per hour heat input.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

#### D.1.4 Monitoring

In order to demonstrate compliance with D.1.2, the boilers shall combust only natural gas.

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

#### D.1.5 Record Keeping Requirements [40 CFR part 60.48c]

- (a) Pursuant to 40 CFR Part 60.48c, records shall be maintained of the amounts of natural gas combusted during each day by the 10.5 and 16.4 MMBtu/hr boilers. These records shall be kept for at least the past 24 month period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements [40 CFR part 60.48c]

The Permittee shall submit notification of the date of construction of the boiler B-3 as provided by 40 CFR 60.7. The notification shall include the items listed under 40 CFR 60.48c(a)(1) through (4).

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Source Modification and a Minor Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	SCA North America Packaging Division
<b>Source Location:</b>	955 S. Woodland Avenue, Michigan City, IN 46360
<b>County:</b>	LaPorte
<b>SIC Code:</b>	3086
<b>Operation Permit No.:</b>	T091-7666-00079
<b>Operation Permit Issuance Date:</b>	October 14, 1999
<b>Minor Source Modification No.:</b>	091-20414-00079
<b>Minor Permit Modification No.:</b>	091-20508-00079
<b>Permit Reviewer:</b>	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a source modification application from SCA North America Packaging Division relating to the operation of a polystyrene shape molding operation.

#### History

On November 29, 2004, SCA North America Packaging Division submitted an application to the OAQ requesting to add a natural gas fired steam boiler to their existing plant located at 955 S. Woodland Avenue, Michigan City, Indiana. SCA North America Packaging Division was issued a Part 70 permit (T091-7666-000079) on October 14, 1999.

#### New Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas fired boiler, identified as B-3, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3.

#### Existing Approvals

The source was issued a Part 70 Operating Permit (T191-7666-00079) on October 4, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 091-11627, issued on January 18, 2000;
- (b) First Minor Source Modification No.: 091-12933, issued on January 4, 2001;
- (c) Second Administrative Amendment No.: 091-13602, issued on January 17, 2001;
- (d) First Significant Source Modification No.: 091-14438, issued on November 2, 2001;
- (e) First Significant Permit Modification No.: 091-14496, issued on November 20, 2001;

- (f) First Permit Reopen No.: 091-13378, issued on February 13, 2002;
- (g) Third Administrative Amendment No.: 091-15449, issued on March 20, 2002;
- (h) Second Significant Source Modification No.: 091-15084, issued on April 3, 2002;
- (i) Second Significant Permit Modification No.: 091-15559, issued on July 22, 2002;
- (j) Second Minor Source Modification No.: 091-15886, issued on August 20, 2002;
- (k) First Minor Permit Modification No.: 091-15930, issued on October 4, 2002;
- (l) Third Minor Source Modification No.: 091-16666, issued on May 23, 2003;
- (m) Third Significant Permit Modification No.: 091-16694, issued on July 30, 2003;
- (n) Fourth Minor Source Modification No.: 091-18626, issued on April 6, 2004; and
- (o) Second Minor Permit Modification No.: 091-18823, issued on July 2, 2004.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-3	Boiler (B-3)	30	2	3300	300-350

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Significant Permit Modification 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 application for the purposes of this review was received on November 29, 2004.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 2).

### Potential To Emit Before Controls for Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

Pollutant	Potential To Emit (tons/year)
PM	0.14
PM-10	0.55
SO <sub>2</sub>	0.04
VOC	0.40
CO	6.03
NO <sub>x</sub>	7.18

HAP's	Potential To Emit (tons/year)
Hexane	0.129
Others	0.006
TOTAL	0.135

### Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5) as this modification is subject to a new source performance standard (NSPS), Subpart Dc.

The Minor Source Modification will give the source approval to construct the new emission unit. A Minor Permit Modification will be issued to incorporate the source modification into the Part 70 permit and will give the source approval to operate the new emission unit. The Minor Permit Modification is being performed pursuant to 326 IAC 2-7-12(b)(1).

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Maintenance Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Non Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as nonattainment for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to Nonattainment NSR. See the State Rule Applicability for the source section.
- (b) LaPorte County has been classified as attainment or unclassifiable in Indiana for PM-10, SO<sub>2</sub>, NO<sub>2</sub>, 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 for the source section.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 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 Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Existing Source <sup>1</sup>	46.04	0.18	0.01	< 250 <sup>(1)</sup>	2.02	2.40	--
Boiler B-3 (this modification)	0.14	0.55	0.04	0.40	6.03	7.18	0.129 (single) 0.135 (total)
Total Emissions	46.18	0.73	0.05	< 250 <sup>(2)</sup>	8.05	9.58	0.129 (single) 0.135 (total)

<sup>1</sup> Based on the Potential to Emit after controls of entire source calculated in the Minor Source Modification No. 091-18628, issued on April 6, 2004.

<sup>2</sup> The source has agreed to maintain the source-wide VOC limit of less than 250 tons per year even with the addition of Boiler B-3. Thus, the source will still maintain its PSD minor source status.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability**

- (a) The one (1) 16.4 MMBtu per hour natural gas fired boiler (B-3), to be constructed in 2005, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it is being constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since this boiler only combusts natural gas, it is subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:
  - (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, because the source is not a major source of HAP. The potential source wide emissions of any combination of HAPs and any single HAP are less than 25 and 10 tons per twelve (12) consecutive month period, respectively.

### State Rule Applicability - Entire Source

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

This source is still not a major source because this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and the source-wide volatile organic compounds are limited to less than 250 tons per twelve consecutive month period. Pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### 326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler B-3, to be constructed in 2005, with a maximum heat input capacity rating of 16.4 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$P_t = 1.09/Q^{0.26}$$

where:  $P_t$  = maximum allowable particulate matter (PM) emitted per MMBtu heat input  
 $Q$  = total source maximum operation capacity rating = 10.5 + 8.4 + 16.4 = 35.3 MMBtu/hr

$$P_t = 1.09/35.3^{0.26} = 0.431 \text{ lbs PM/MMBtu}$$

#### Compliance calculation:

$$(0.14 \text{ tons PM/yr}) * (\text{hr}/26.9 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0011 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.0011) is less than allowable lbs PM/MMBtu (0.431), therefore the boiler can comply with the requirements of 326 IAC 6-2-3.

## Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 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.

There are no compliance monitoring requirements for this facility.

## Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T091-7666-00079) in order to incorporate the requirements for one (1) new natural gas fired boiler (B-3).

### SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1. **(constructed in 1996)**
- (b) **One (1) natural gas fired boiler, identified as B-3, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3. (constructed in 2005)**

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

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

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

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

#### D.1.42 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions of **from the 10.5 and 16.4 MMBtu per hour boilers** shall be limited to 0.6 **and 0.463** pounds per MMBtu, **respectively**, which was determined by the following equation:

$$P_t = 1.09/Q^{0.26}$$

Pt = Pounds of particulate matter emitted per million Btu heat input

Q = Total source maximum operating a capacity rating in million Btu per hour heat input.

### **D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

### **Compliance Determination Requirements**

#### **D.1.2 Testing Requirements [326 IAC 2-7-6(1)]**

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

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

#### **D.1.34 Monitoring**

**In order to demonstrate compliance with D.1.2, the boilers shall combust only natural gas.**

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

#### **D.1.45 Record Keeping Requirements [40 CFR part 60.48c]**

- (a) Pursuant to 40 CFR part 60.48c, records shall be maintained of the amounts of natural gas combusted during each day by the 10.5 and 16.4 MMBtu/hr boilers. These records shall be kept for at least the past 24 month period.**
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.1.6 Reporting Requirements [40 CFR part 60.48c]**

**The Permittee shall submit notification of the date of construction of the boiler B-3 as provided by 40 CFR 60.7. The notification shall include the items listed under 40 CFR 60.48c(a)(1) through (4).**

2. The emission statement rule has been revised and effective on March 27, 2004. Therefore the Emission Statement condition in this permit has been revised as follows:

#### **C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

**In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate estimated actual emission of all pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting) listed in 326 IAC 2-6-4(a);**

(2) Indicate **estimated** actual emissions of ~~other~~ regulated pollutants **as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”)** from the source, for purposes of ~~Part 70~~ fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

**The statement must be submitted to:**

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

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

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

**Conclusion**

The construction and operation of one (1) boiler (B-3) shall be subject to the conditions of the attached proposed Minor Source Modification No. 091-20414-00079 and Minor Permit Modification No. 091-20508-00079.

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

**Company Name:** SCA North America Packaging Division  
**Address City IN Zip:** 955 S. Woodland Avenue, Michigan City, IN 46360  
**Permit No.:** 091-20508-00079  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** December 17, 2004

Heat Input Capacity  
MMBtu/hr  
16.4

Potential Throughput  
MMCF/yr  
143.7

**Facilities**  
One boiler identified as B-3

**MMBtu/hr**  
16.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.55	0.04	7.18	0.40	6.03

\*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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM Btu/hr 0.3 - < 100**

**HAPs Emissions**

**Company Name:** SCA North America Packaging Division  
**Address City IN Zip:** 955 S. Woodland Avenue, Michigan City, IN 46360  
**Permit No.:** 091-20508-00079  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** December 17, 2004

HAPs - Organics

	Benzene	Dichlorobenzene	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	1.508E-04	8.620E-05	5.387E-03	1.293E-01	2.442E-04

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	3.592E-05	7.902E-05	1.006E-04	2.730E-05	1.508E-04

Methodology is the same as on the previous page.

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