



*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: August 31, 2006  
RE: Hazen Paper Company / 137-23025-00022  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 03/23/06



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## NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Hazen Paper Company  
604 Railroad Avenue  
Osgood, Indiana 47037**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages. This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: 137-23025-00022	
Issued by:	Issuance Date: August 31, 2006
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: August 31, 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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates stationary specialty paper manufacturer.

Authorized Individual:	Vice President of Technical Services
Source Address:	604 Railroad Avenue, Osgood, Indiana 47037
Mailing Address:	240 South Water Street, P.O. Box 189, Holyoke, MA, 01040
General Source Phone Number:	812-689-6502
SIC Code:	2672
County Location:	Ripley
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hour, exhausting to stack SCB-1.
- (b) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hour, exhausting to stack SCB-2.
- (c) One (1) Hurst natural-gas fired boiler, identified as H1, to be constructed in 2006, with a maximum heat input of 1.25 MMBtu/hour, exhausting to stack SH-1.
- (d) Five (5) existing natural-gas fired space heaters, identified as R1 through R5, constructed in 2001, with a maximum heat input of 0.20 MMBtu/hour each, exhausting to stacks SR-1 through SR-5.
- (e) Three (3) natural-gas fired space heaters, identified as C1 through C3, to be constructed in 2006, with a maximum heat input of 0.90, 1.30, and 1.30 MMBtu/hour, respectively, exhausting internally.
- (f) One (1) laminator, identified as L6, to be constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural-gas fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hour, exhausting to stacks SL6-D1, SL6-D2.
- (g) One (1) cold cleaning degreasing operation, identified as PW-1, to be constructed in 2006, with a maximum capacity of 0.055 gal/day.
- (h) One (1) maintenance and grinding operation, control by dust collector DC1, exhausting to stack SDC-1, with a maximum air flow of 5,300 cfm, to be constructed in 2006.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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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 2-1.1-1) shall prevail.

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, 137-23025-00022, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.6 Enforceability**

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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.7 Severability**

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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.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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- (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 an "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.10 Certification**

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- (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 Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue,  
Indianapolis, 46204-2251
- (c) The notification 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.

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ . IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 137-23025-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) Deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "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, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this .
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.17 Source Modification Requirement**

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

**B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]**

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.20 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) 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.21 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article

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]

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

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

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

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- (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 an "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 2-6.1-5(a)(2)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 an "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 an "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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-6.1-5(a)(2)]**

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

## Corrective Actions and Response Steps

### C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

## Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

### C.13 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) 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 46204-2251
- (b) 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.
- (c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hour, exhausting to stack SCB-1.
- (b) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hour, exhausting to stack SCB-2.
- (c) One (1) Hurst natural-gas fired boiler, identified as H1, to be constructed in 2006, with a maximum heat input of 1.25 MMBtu/hour, exhausting to stack SH-1.

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

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

#### D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from 6.28 MMBtu per hour Cleaver Brooks boiler CB1 and the 4.19 MMBtu per hour Cleaver Brooks boiler CB2, which were existing on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input for each boiler.

#### D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the Hurst boiler, identified as H1, shall not exceed 0.57 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity of boilers (MMBtu/hr)}$$

For this unit,  $Q = 11.72$  (MMBtu/hr).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (f) One (1) laminator, identified as L6, to be constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural-gas fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hour, exhausting to stacks SL6-D1, SL6-D2.

(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 2-6.1-5(a)(1)]

#### D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the Permittee shall not allow, cause, or permit the discharge into the atmosphere VOC in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line.

### Compliance Determination Requirements

#### D.2.2 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC 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 Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.3 Record Keeping Requirements

- (a) To document compliance with condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.1.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (g) One (1) cold cleaning degreasing operation, identified as PW-1, to be constructed in 2006, with a maximum capacity of 0.055 gal/day.

(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 2-6.1-5(a)(1)]

#### D.3.1 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.3.2 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<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>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.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Hazen Paper Company
Address:	604 Railroad Avenue
City:	Osgood, Indiana 47037
Phone #:	812-689-6502
MSOP #:	137-23025-00022

I hereby certify that Hazen Paper Company is

- still in operation.  
 no longer in operation.

I hereby certify that Hazen Paper Company is

- in compliance with the requirements of MSOP 137-23025-00022.  
 not in compliance with the requirements of MSOP 137-23025-00022.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? \_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ? \_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES? \_\_\_\_\_, 25 TONS/YEAR VOC ? \_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ? \_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ? \_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? \_\_\_\_\_, 25 TONS/YEAR FLUORIDES ? \_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ? \_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? \_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? \_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y    N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y    N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_

LOCATION: (CITY AND COUNTY) \_\_\_\_\_

PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_    AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_    AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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Hazen Paper Company  
240 South Water Street, P.O. Box 189  
Holyoke, MA 01040

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Hazen Paper Company, LLC, 604 Railroad Avenue, Osgood, Indiana, 47037, completed construction of the specialty paper manufacturing operation on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 27, 2006 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. CP-137-23025-00022, Plant ID No. 137-00022 issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires:

Signature \_\_\_\_\_

\_\_\_\_\_  
Name (typed or printed)

# Indiana Department of Environmental Management

## Office of Air Quality

### Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

#### Source Background and Description

Source Name:	Hazen Paper Company
Source Location:	604 Railroad Avenue, Osgood, Indiana 47037
County:	Ripley
SIC Code:	2672
Operation Permit No.:	M137-23025-00022
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a renewal application from Hazen Paper Company relating to the operation of a stationary specialty paper manufacturing operation.

#### History

Hazen Paper Company submitted an application for a Minor Source Operating Permit (MSOP) on April 27, 2006. The source has purchased a previously-owned facility in which the Cleaver Brooks Boilers (CB1 and CB2) and the five (5) natural gas-fired space heaters (R1 through R5) were already installed. All other facilities are new.

#### New Emission Units and Pollution Control Equipment

The source will construct the following emission units and pollution control devices:

- (a) One (1) Hurst natural-gas fired boiler, identified as H1, to be constructed in 2006, with a maximum heat input of 1.25 MMBtu/hour, exhausting to stack SH-1.
- (b) Three (3) natural-gas fired space heaters, identified as C1 through C3, to be constructed in 2006, with a maximum heat input of 0.90, 1.30, and 1.30 MMBtu/hour, respectively, exhausting internally.
- (c) One (1) laminator, identified as L6, to be constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural-gas fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hour, exhausting to stacks SL6-D1, SL6-D2.
- (d) One (1) cold cleaning degreasing operation, identified as PW-1, to be constructed in 2006, with a maximum capacity of 0.055 gal/day.
- (e) One (1) maintenance and grinding operation, control by dust collector DC1, exhausting to stack SDC-1, with a maximum air flow of 5,300 cfm, to be constructed in 2006.

#### Unpermitted Emission Units and Pollution Control Equipment Not Previously Requiring Approval

The following emission units are existing units at this source:

- (a) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hour, exhausting to stack SCB-1.

- (b) One (1) existing Cleaver Brooks natural-gas fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hour, exhausting to stack SCB-2.
- (c) Five (5) existing natural-gas fired space heaters, identified as R1 through R5, constructed in 2001, with a maximum heat input of 0.20 MMBtu/hour each, exhausting to stacks SR-1 through SR-5.

The above units were previously constructed at the facility prior to Hazen Paper Company's acquisition. The two Cleaver Brooks boilers and the five natural gas fired space heaters were previously exempt per 326 IAC 2-1.1-3(e)(1).

### Existing Approvals

There are no previous approvals for this source.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
SCB-1	Cleaver Brooks Boiler CB1	28	1.5	1,000	225
SCB-2	Cleaver Brooks Boiler CB2	25	1.0	1,500	225
SH-1	Hurst Boiler H1	25	0.834	300	225
SR-1	Space Heater R1	25	0.67	2,800	250
SR-2	Space Heater R2	25	0.67	2,800	250
SR-3	Space Heater R3	25	0.67	2,800	250
SR-4	Space Heater R4	25	0.67	2,800	250
SR-5	Space Heater R5	25	0.67	2,800	250
SL6-D1	Laminator Dryer L6D1	30	33" x 22"	5,750	370
SL6-D2	Laminator Dryer L6D2	30	33" x 22"	5,750	370
Ozone (L6)	Laminator Dryer	25	0.34	400	100
Steam (L6)	Laminator Dryer	25	0.67	450	150
SDC-1	Dust Collector DC1	8	1.2 x 2.1	2,200	ambient

### Recommendation

The staff recommends to the Commissioner that the construction and 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 April 27, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1-7).

### Potential to Emit of the Source Before Controls

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

enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/year)
PM	0.94
PM10	0.94
SO <sub>2</sub>	0.06
VOC	82.7
CO	8.39
NO <sub>x</sub>	9.92
HAPs	0.19

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) VOC is greater than 25 tons per year and less than 100 tons per year. The potential to emit all other criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (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.

**County Attainment Status**

The source is located in Ripley County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Ripley County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) emissions 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 ozone. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx 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.
- (c) Ripley County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, CO, lead and NO<sub>2</sub>. 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.

- (e) 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 applicability.

### Source Status

New 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/year)
PM	0.94
PM10	0.94
SO <sub>2</sub>	0.06
VOC	82.7
CO	8.34
NO <sub>x</sub>	9.92
Combination HAPs	0.19

This new source is not a major stationary source because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This new 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 is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart D – Standards of Performance for Fossil Fuel-Fired Steam Generators for Which Construction Commenced After August 17, 1971 (326 IAC 12), are not included in this permit. The two natural-gas fired Cleaver Brooks boilers CB1 and CB2 and the Hurst boiler H1, each have heat input rates of less than 250 MMBtu per hour.
- (c) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da – Standards of Performance for Electric Utility Steam Generating Units (40 CFR 60.40a and 326 IAC 12), are not included in this permit. The two natural-gas fired Cleaver Brooks boilers CB1 and CB2 and the Hurst boiler H1, each have heat input rates of less than 250 MMBtu per hour.
- (d) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

- (40 CFR 60.40b and 326 IAC 12), are not included in this permit. The two natural-gas fired Cleaver Brooks boilers CB1 and CB2 and the Hurst boiler H1, each have heat input rates of less than 100 MMBtu per hour.
- (e) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c and 326 IAC 12), are not included in this permit. The two natural-gas fired Cleaver Brooks boilers CB1 and CB2 and the Hurst boiler H1, each have heat input rates of less than 10 MMBtu per hour.
  - (f) The Safety Kleen cold cleaner cabinet for maintenance, identified as PW-1, is not subject to the requirements of the National Emission Standards for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T because the operation does not use solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these HAPs, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
  - (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
  - (h) The requirements of 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters are not included in this permit. This NESHAP applies only to process heaters and boilers located at sources that are major sources of HAPs. This source is not a major source of HAPs.
  - (i) The requirements of 40 CFR 63, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating are not included in this permit. This NESHAP applies to sources that operate web coating lines and are a major source of HAPs. This source is not a major source of HAPs.

#### **State Rule Applicability – Entire Source**

##### **326 IAC 2-2 Prevention of Significant Deterioration**

Hazen Paper Company has a potential to emit for all criteria pollutants below 250 tons per year and is located in a county that is attainment for all criteria pollutants. Therefore, 326 IAC 2-2 does not apply.

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

This source is located in Ripley County is not required to have a Title V permit and does not have the potential to emit 5 tons per year of lead. Therefore, 326 IAC 2-6 does 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.

##### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) are not

included in this permit. The only sources of fugitive particulate matter at this facility are paved roads. The fugitive emissions from paved roads are negligible, therefore 326 IAC 6-5 is not included in this permit.

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

This new source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability – Individual Facilities**

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

The laminating operation, identified as L6, is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the process utilizes rollcoating for application of coatings and adhesives. Pursuant to 326 IAC 6-3-1(b)(6), surface coating operations that utilize rollcoating are exempt from this rule.

The maintenance and grinding operation, controlled by dust collector DC1, is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the potential to emit before control is less than five hundred fifty-one thousandths (0.551) pound per hour.

The five (5) natural gas-fired space heaters, identified as R1 through R5, constructed in 2001, the three (3) natural gas-fired space heaters, identified as C1 through C3, to be constructed in 2006, and the two laminator drying ovens, identified as L6D1 and L6D2, to be constructed in 2006, are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), because pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with a potential to emit of less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule.

325 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The Cleaver Brooks natural gas-fired boilers, identified as CB-1 and CB-2, are subject to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c), because the facilities are sources of indirect heating that were constructed prior to September 21, 1983.

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from each boiler shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m<sup>3</sup>

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (10.5 MMBtu/hr)

N = number of stacks (2)

a = plume rise factor (0.67)

h = stack height (26.8 ft)

Pt = 1.69 lb/MMBtu

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), for facilities which were existing prior to June 8, 1972, the PM emissions from each boiler shall in no case exceed 0.8 pounds per MMBtu heat input.

The Hurst natural gas-fired boiler, identified as H1, is subject to 327 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d) because this facility is to be constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from Boiler No. 1 shall not exceed 0.57 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$P_t = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity of boilers (MMBtu/hr)}$$

For this unit,  $Q = 11.72$  (MMBtu/hr).

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

The laminating operation, identified as L6, is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because the facility is to be constructed after July 1, 1990, has the potential to emit greater than fifteen (15) pounds per day, and the process involves web coating or saturation of paper. Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line. The facility uses coatings and adhesives that are in compliance with this requirement.

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

This source is not subject to 326 IAC 8-5-5 (Graphic Arts Operations) because this facility does not contain any packaging rotogravure, publication rotogravure, or flexographic printing sources.

#### 326 IAC 8-3-2 (Cold Cleaner Operation)

This source is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation), because the facility is a cold cleaner degreasing operation constructed after January 1, 1980. The Permittee shall ensure that the following requirements are met:

- (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 (Cold Cleaner Degreaser Operation and Control)

The cold cleaning degreasing operation, identified as PW-1, is subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because the facility is a new cold cleaning operation to be constructed after July 1, 1990 and located in Ripley county. 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:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) 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));
  - (2) The solvent is agitated; or
  - (3) The solvent is heated.

- (b) 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.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) 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)):
  - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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:

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (c) 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.

## Conclusion

The construction and operation of this stationary speciality paper manufacturing operation shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 137-23025-00022.

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

**Company Name: Hazen Paper Company  
Address: 604 Railroad Avenue, Osgood, Indiana 47037  
MSOP: 137-22025-00022  
Reviewer: ERG/TDP  
Date: May 23, 2006**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Confidential Coating	8.17	61.0%	57.1%	3.99%	55.9%	38.80%	0.41000	120.0	0.33	16.0	385	70.2	0.00	0.84	100%

**State Potential Emissions**

**Totals                    16.0                    385                    70.2                    0.00**

\*Transfer efficiency assumed to be 100%. All materials are applied through roll coating.

**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)

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate (gal/unit) \* Maximum (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) \* Usage Rate (gal/unit) \* Density (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  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Hazen Paper Company  
Address: 604 Railroad Avenue, Osgood, Indiana 47037  
MSOP: 137-22025-00022  
Reviewer: ERG/TDP  
Date: May 23, 2006**

Material	Density (lbs/gal)	Weight % VOC	Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Confidential Adhesive	8.80	0.5%	0.57	120	0.04	2.71	65.0	11.9

\*There are no particulate emissions from adhesive application. Adhesive is applied through roll coating.

**METHODOLOGY**

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate(gal/unit) \* Maximum (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Usage Rate (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**Combustion Emissions from the Natural Gas-fired Boilers, Space Heaters, and Air Make-Up Units**

**Company Name: Hazen Paper Company**  
**Address: 604 Railroad Avenue, Osgood, Indiana 47037**  
**Registration: 137-22025-00022**  
**Reviewer: ERG/TDP**  
**Date: May 23, 2006**

Description	Emission Unit ID	Heat Input Capacity (MMBtu/hour)	Max. Potential Throughput (MMCF/year)
Natural Gas Boiler	CB-1	6.28	53.9
Natural Gas Boiler	CB-2	4.19	35.9
Natural Gas Boiler	H1	1.25	10.7
Natural Gas Fired Space Heater	R1	0.20	1.7
Natural Gas Fired Space Heater	R2	0.20	1.7
Natural Gas Fired Space Heater	R3	0.20	1.7
Natural Gas Fired Space Heater	R4	0.20	1.7
Natural Gas Fired Space Heater	R5	0.20	1.7
Natural Gas Fired Space Heater	C1	0.90	7.7
Natural Gas Fired Space Heater	C2	1.30	11.2
Natural Gas Fired Space Heater	C3	1.30	11.2
Laminator Dryer	L6D1	3.45	29.6
Laminator Dryer	L6D2	3.45	29.6

Pollutant Emission Factors (lbs/MMCF)						
PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub> **	CO	VOC	HAPs
7.6	7.6	0.6	100	84.0	5.5	1.89

Emission Unit ID	Potential To Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPs
CB-1	0.20	0.20	0.02	2.69	2.26	0.15	0.05
CB-2	0.14	0.14	0.01	1.80	1.51	0.10	0.03
H1	0.04	0.04	0.00	0.54	0.45	0.03	0.01
R1	0.01	0.01	0.00	0.09	0.07	0.00	0.00
R2	0.01	0.01	0.00	0.09	0.07	0.00	0.00
R3	0.01	0.01	0.00	0.09	0.07	0.00	0.00
R4	0.01	0.01	0.00	0.09	0.07	0.00	0.00
R5	0.01	0.01	0.00	0.09	0.07	0.00	0.00
C1	0.03	0.03	0.00	0.39	0.32	0.02	0.01
C2	0.04	0.04	0.00	0.56	0.47	0.03	0.01
C3	0.04	0.04	0.00	0.56	0.47	0.03	0.01
L6D1	0.11	0.11	0.01	1.48	1.24	0.08	0.03
L6D2	0.11	0.11	0.01	1.48	1.24	0.08	0.03
<b>Totals</b>	<b>0.75</b>	<b>0.75</b>	<b>0.06</b>	<b>9.92</b>	<b>8.34</b>	<b>0.55</b>	<b>0.19</b>

\*PM10 emission factor is for condensable and filterable PM and PM10 combined. PM emissions are for filterable PM only.

\*\*Emission factor for NO<sub>x</sub>: Uncontrolled = 100

Emission factors from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

1 MMCF = 1,020 MMBtu

**Methodology**

Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMCF/1,020 MMBtu.

PTE (tons/year) = Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

**Appendix A: Emission Calculations  
VOC and HAP Emissions  
Degreasing Operations**

**Company Name: Hazen Paper Company  
Address: 604 Railroad Avenue, Osgood, Indiana 47037  
MSOP: 137-22025-00022  
Reviewer: ERG/TDP  
Date: May 23, 2006**

Material*	Usage (gal/day)	Density (lb/gal)	Usage (tons/yr)	Volatile Component (%)	PTE of VOC (tons/yr)	Total HAP Component (%)	PTE Total HAP (tons/yr)
Mineral Spirits	0.0055	6.80	6.83E-03	100.0%	6.83E-03	0.0%	0.00

**METHODOLOGY**

Usage (tons/yr) = Usage (gal/day) \* Density (lb/gal) \* 365 day/year \* 1 ton/2000 Lb

PTE of VOC/HAP (tons/year) = Usage (tons/yr) \* Volatile/HAP Component (%)

**Appendix A: Emission Calculations  
Grinding Operations**

**Company Name: Hazen Paper Company  
Address: 604 Railroad Avenue, Osgood, Indiana 47037  
MSOP: 137-22025-00022  
Reviewer: ERG/TDP  
Date: May 23, 2006**

**POTENTIAL TO EMIT IN TONS PER YEAR USING AMOUNT OF DUST COLLECTED**

Baghouse ID	Pollutant	No of Filters	Dust Collected (lbs/grind/filter)	No. of Grinds per Year (grinds/year)	Control Efficiency (%)	Capture Efficiency (%)	Potential to Emit Before Control	
							(lbs/year)	(tons/year)
DC1	PM/PM10	3	1.1	104	95.0%	95.0%	380	0.19

Note: The dust collected (lbs/grind/filter) was calculated by information from test grinds at the Massachussets Hazen Paper facility, where a dry filter was weighed before and after the grind.

The control/capture efficiency data was taken from information from the American Air Filter Co., Inc.

**Methodology**

PTE PM/PM10 (tons/year) = No. of Filters x Dust collected (lbs/grind/filter) \* No.of Grinds per Year / (Control Efficiency(%)) \* Capture Efficiency(%)) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Hazen Paper Company  
**Address:** 604 Railroad Avenue, Osgood, Indiana 47037  
**MSOP:** 137-22025-00022  
**Reviewer:** ERG/TDP  
**Date:** May 23, 2006

<b>Emission Units</b>	<b>PM*</b>	<b>PM10*</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>HAP</b>
Coating Application	0.00	0.00			70.2		
Adhesive Application	0.00	0.00			11.9		
Combustion	0.75	0.75	0.06	9.92	0.55	8.34	0.19
Degreasing Operation					0.01		0.00
Grinding Operation	0.19	0.19					
<b>Totals:</b>	<b>0.94</b>	<b>0.94</b>	<b>0.06</b>	<b>9.92</b>	<b>82.7</b>	<b>8.34</b>	<b>0.19</b>