



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: February 5, 2007  
RE: TIN, Inc. dba Temple-Inland / 107-23552-00060  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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Indianapolis, Indiana 46204-2251  
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Mr. Rick Eakes  
TIN, Inc., d/b/a Temple-Inland  
801 North Englewood Drive  
Crawfordsville, IN 47933

February 5, 2007

Re: 107-23552-00060  
**First Significant Permit Revision to  
MSOP 107-17679-00060**

Dear Mr. Eakes:

TIN, Inc., d/b/a Temple-Inland, was issued a minor source operating permit on June 4, 2004 for a corrugated solid fiber box manufacturing operation located at 801 North Englewood Drive, Crawfordsville, Indiana. A letter requesting a revision to this permit was received on August 25, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of one (1) three-color evol flexo folder gluer, identified as EU-013, and a capacity increase for the existing printing and gluing operations.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire MSOP, with all revisions made to it, is being provided.

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 Patrick Brennan, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395, ext. 21 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

PTB:MES

Attachments

cc: File - Montgomery County  
U.S. EPA, Region V  
Montgomery County Health Department  
Air Compliance Section Inspector - Jim Thorp  
Compliance Branch  
Administrative and Development  
Technical Support and Modeling - Michele Boner



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**Minor Source Operating Permit**  
**OFFICE OF AIR QUALITY**  
**TIN, Inc. d/b/a Temple-Inland**  
**801 North Englewood Drive**  
**Crawfordsville, Indiana 47933**

(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.

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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, , 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages

Operation Permit No.: MSOP 107-17679-00060	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 4, 2004 Expiration Date: June 4, 2009

1<sup>st</sup> Notice Only Change No. 107-20568-00060      Issuance Date: February 17, 2005

First Significant Permit Revision No.: 107-23552-00060	Affected Sections: Entire Permit
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 5, 2007 Expiration Date: June 4, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.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 a corrugated solid fiber box manufacturing source..

Authorized Individual:	General Manager
Source Address:	801 North Englewood Drive, Crawfordsville, Indiana 47933
Mailing Address:	801 North Englewood Drive, Crawfordsville, IN 47933
General Source Phone Number:	765-362-4010
SIC Code:	2653
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

### 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) natural gas-fired boiler, identified as A-57, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 002, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (b) One (1) natural gas-fired boiler, identified as A-58, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 003, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (c) One (1) starch silo, identified as 004, constructed in 1972, equipped with baghouse 004 for particulate control, exhausting to Stack 004, capacity: 100,000 pounds of corn starch.
- (d) One (1) trim waste collection system, identified as 005, constructed in 1972, consisting of a flexo transfer cyclone, exhausting to Stack 005, capacity: 5,449 pounds of trim waste per hour.
- (e) One (1) 99-inch corrugator, identified as C-40, constructed in 1972, equipped with the one (1) trim waste collection system identified as 005, capacity: 1,000 feet per minute and 113,845 pounds of paper per hour.
- (f) One (1) dust collection system used to clean board prior to printing, identified as 006, constructed in 1997, equipped with a baghouse for particulate control, exhausting to Stack 006, throughput: 46,762 pounds of board per hour or 7,320 pounds of dust per year.
- (g) One (1) cornstarch mixing tank, constructed in 1972, capacity: 3,000 gallons of cornstarch.
- (h) Two (2) corn starch storage tanks, identified as Tank 1 and Tank 2, both constructed in 1972, capacity: 3,000 gallons of cornstarch, each.

- (i) One (1) spare tank for cornstarch storage, identified as Spare Tank, constructed in 1990, capacity: 500 gallons of cornstarch.
- (j) One (1) standby #2 fuel tank, constructed in 1998, capacity: 12,000 gallons of fuel.
- (k) One (1) waste water treatment system.
- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 62 by 109 inches.
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 62 by 109 inches.
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 34 by 90 inches.
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: 1,500 sheets per hour, with a maximum page size of 38 by 56 inches.
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: 2,700 sheets per hour, with a maximum page size of 58 by 105 inches.
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: 10,000 sheets per hour, with a maximum page size of 38 by 56 inches.
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: 10,000 sheets per hour, with a maximum page size of 38 by 64 inches.
- (s) One (1) three-color evol flexo folder gluer, identified as EU-013, approved for construction in 2007, equipped with a flowcoater for glue application, capacity: 5,250 sheets per hour, with a maximum page size of 34 by 83.9 inches.

## **SECTION B GENERAL CONDITIONS**

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- (a) This permit, 107-17679-00060, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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.4 Enforceability**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability**

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.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

- (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.8 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.9 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, Indiana 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.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to 107-17679-00060 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (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.14 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 permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by 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.15 Source Modification Requirement**

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

**B.16 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, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.17 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.18 Annual Fee Payment [326 IAC 2-1.1-7]

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### 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 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 Stack Height [326 IAC 1-7]

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

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

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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 applic-

able 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.9 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.10 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.11 Compliance Monitoring [326 IAC 2-1.1-11]**

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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.14 Response to Excursions or Exceedances**

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

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

**C.15 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.16 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.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (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

### Emissions Unit Description: Boilers

- (a) One (1) natural gas-fired boiler, identified as A-57, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 002, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (b) One (1) natural gas-fired boiler, identified as A-58, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 003, rated at 14.645 million British thermal units per hour and 350 horsepower.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pound per million British thermal units heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the 27.27 million British thermal units per hour oil-fired boiler shall not exceed five tenths (0.5) pound per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers with a total rating of 29.29 MMBtu per hour, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### **D.1.5 Visible Emissions Notations**

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- (a) Visible emission notations from each of the two (2) boilers stack exhaust shall be performed once per day during normal daylight operations when combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
  - (4) Fuel supplier certifications;
  - (5) The name of the fuel supplier; and
  - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-

chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations from each of the two (2) boilers stack exhaust once per day.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

- (a) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (b) A semi-annual summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Miscellaneous Operations

- (c) One (1) starch silo, identified as 004, constructed in 1972, equipped with baghouse 004 for particulate control, exhausting to Stack 004, capacity: 100,000 pounds of corn starch.
- (d) One (1) trim waste collection system, identified as 005, constructed in 1972, consisting of a flexo transfer cyclone, exhausting to Stack 005, capacity: 5,449 pounds of trim waste per hour.
- (e) One (1) 99-inch corrugator, identified as C-40, constructed in 1972, equipped with the one (1) trim waste collection system identified as 005, capacity: 1,000 feet per minute and 113,845 pounds of paper per hour, equipped with:
- (f) One (1) dust collection system used to clean board prior to printing, identified as 006, constructed in 1997, equipped with a baghouse for particulate control, exhausting to Stack 006, throughput: 46,762 pounds of board per hour or 7,320 pounds of dust per year.
- (g) One (1) cornstarch mixing tank, constructed in 1972, capacity: 3,000 gallons of cornstarch.
- (h) Two (2) cornstarch storage tanks, identified as Tank 1 and Tank 2, both constructed in 1972, capacity: 3,000 gallons of cornstarch, each.
- (i) One (1) spare tank for cornstarch storage, identified as Spare Tank, constructed in 1990, capacity: 500 gallons of cornstarch.
- (j) One (1) standby #2 fuel tank, constructed in 1998, capacity: 12,000 gallons of fuel.
- (k) One (1) waste water treatment system.

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

### D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) trim waste collection system shall not exceed 45.8 pounds per hour when operating at a process weight rate of 113,845 pounds per hour.

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

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) dust collection system shall not exceed 33.9 pounds per hour when operating at a process weight rate of 46,762 pounds per hour.

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

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

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

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- (a) In order to comply with Condition D.2.1, the flexo transfer cyclone and baghouse for particulate control shall be in operation and control emissions from the one (1) trim waste collection system and the one (1) 99-inch corrugator at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.2.4 Visible Emissions Notations

---

- (a) Visible emission notations of the from the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.5 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse used in conjunction with the one (1) dust collection system, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading

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

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

#### D.2.6 Broken or Failed Bag Detection

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- (a) For a single compartment controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

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

#### D.2.7 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

### **Record Keeping and Reporting Requirement**

#### D.2.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust once per day.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description: Printing and Gluing Operations

- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 62 by 109 inches.
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 62 by 109 inches.
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: 2,000 sheets per hour, with a maximum page size of 34 by 90 inches.
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: 1,500 sheets per hour, with a maximum page size of 38 by 56 inches.
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: 2,700 sheets per hour, with a maximum page size of 58 by 105 inches.
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: 10,000 sheets per hour, with a maximum page size of 38 by 56 inches.
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: 10,000 sheets per hour, with a maximum page size of 38 by 64 inches.
- (s) One (1) three-color evol flexo folder gluer, identified as EU-013, approved for construction in 2007, equipped with a flowcoater for glue application, capacity: 5,250 sheets per hour, with a maximum page size of 34 by 83.9 inches.

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

#### Emission Limitations and Standards

##### D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of 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, from EO-75, EO-93, EG-128, EG-113, EG-114 and EU-013.

Compliance with this limitation shall be determined using the volume weighted average method detailed in Condition D.3.4.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control device.

## Compliance Determination Requirements

### D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 or another approved alternative method in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### D.3.4 VOC Emissions

Pursuant to 326 IAC 8-1-2(a)(7), when volume weighted averaging of the coatings is used to determine compliance with the limitation set in Condition D.3.1. This volume weighted average shall be determined by the following equation:

$$A = [ \sum (C \times U) / \sum U ]$$

Where: A = the volume weighted average in pounds VOC per gallon;  
C = the VOC content of the coating in pounds VOC per gallon; and  
U = is the usage rate of the coating in gallons per unit, hour, day or other unit of time

## Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

### D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The volume weighted VOC content of the coatings used for each time frame used to show compliance with Condition D.3.4;
  - (3) The total VOC usage for each time frame used to show compliance with Condition D.3.4; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

<b>Company Name:</b>	<b>TIN, Inc., d/b/a Temple-Inland</b>
<b>Address:</b>	<b>801 North Englewood Drive</b>
<b>City:</b>	<b>Crawfordsville, Indiana</b>
<b>Phone #:</b>	<b>317-879-4227</b>
<b>MSOP #:</b>	<b>107-17679-00060</b>

I hereby certify that TIN, Inc., d/b/a Temple-Inland is  still in operation.  
 no longer in operation.

I hereby certify that TIN, Inc., d/b/a Temple-Inland is  in compliance with the requirements of MSOP 107-17679-00060.  
 not in compliance with the requirements of MSOP 107-17679-00060.

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

**SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: TIN, Inc., d/b/a Temple-Inland  
Source Address: 801 North Englewood Drive, Crawfordsville, Indiana 47933  
Mailing Address: 801 North Englewood Drive, Crawfordsville, Indiana 47933  
Permit No.: 107-17679-00060

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

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

A certification by an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>TIN, Inc., d/b/a Temple-Inland</b>
<b>Source Location:</b>	<b>801 North Englewood Drive, Crawfordsville, IN 47933</b>
<b>County:</b>	<b>Montgomery</b>
<b>SIC Code:</b>	<b>2653</b>
<b>Operation Permit No.:</b>	<b>MSOP 107-17679-00060</b>
<b>Operation Permit Issuance Date:</b>	<b>June 4, 2004</b>
<b>Significant Permit Revision No.:</b>	<b>SPR 107-23552-00060</b>
<b>Permit Reviewer:</b>	<b>Patrick Brennan/MES</b>

The Office of Air Quality (OAQ) has reviewed a revision application from TIN, Inc., d/b/a Temple-Inland, relating to the construction and operation of the following emission units and pollution control devices:

- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 34 by 90 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 94 inches.~~
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: **1,500 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 80 inches.~~
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: **2,700 sheets per hour, with a maximum page size of 58 by 105 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~

- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 64 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 110 inches.~~
- (s) ~~One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (s) **One (1) three-color evol flexo folder gluer, identified as EU-013, approved for construction in 2007, equipped with a flowcoater for glue application, capacity: 5,250 sheets per hour, with a maximum page size of 34 by 83.9 inches.**

## History

On August 25, 2006, Temple-Inland submitted an application to the OAQ requesting to add one (1) additional three-color flexo folder gluer, identified as EU-013, in their existing plant, and indicated that one (1) existing flexo gluer identified as EG-74, will be removed from service prior to the installation of UE-013. The application also contained updated VOC potential to emit calculations for printing processes indicating a capacity increase.

The source was issued MSOP 107-17679-00060 on June 4, 2004. A Notice Only Change, 107-20568-00060, changing the name of the source from Inland Paperboard and Packaging to TIN, Inc., d/b/a Temple-Inland, was issued on February 17, 2005.

## Enforcement Issue

There are no enforcement actions pending.

## Stack Summary

There are no stacks associated with this modification.

## Recommendation

The staff recommends to the Commissioner that the MSOP Significant Permit Revision 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 August 25, 2006. Additional information was received on November 13, 2006 and November 20, 2006.

## Emission Calculations

See pages 1 - 7 of 7 of Appendix A of this document for detailed emissions calculations from the printing and gluing processes.

## Potential To Emit of Revision

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.”

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	-
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	38.22
CO	-
NO <sub>x</sub>	-

Note: Because the Permittee is using different coatings, while there is an increase in VOC emissions, there is no net increase in HAPs emissions due to this modification.

**Justification for Revision**

The MSOP is being revised through a MSOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(i) because the potential to emit of VOC is greater than 25 tons per year.

**County Attainment Status**

The source is located in Montgomery County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>2.5</sub>	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-Hour Ozone	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 and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

- (b) Montgomery County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability for the source section.
- (c) Montgomery County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, 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 - Entire Source section of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	3.06
PM <sub>10</sub>	3.06
SO <sub>2</sub>	65.8
VOC	13.5
CO	10.8
NO <sub>x</sub>	18.5

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon calculations submitted by the applicant and verified by OAQ for MSOP 107-17619-00060, issued on June 4, 2004.

**Potential to Emit of Revision After Issuance**

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Proposed Revision Printing Processes	-	-	-	35.57	-	-	*1.84
Proposed Revision Gluing	-	-	-	2.65	-	-	*2.59
Existing Emissions Printing Processes	-	-	-	8.11	-	-	-
Existing Emissions Gluing	-	-	-	4.65	-	-	-
Existing Emissions Starch Silo	0.001	0.001	-	-	-	-	-
Existing Emissions Trim Waste	1.20	1.20	-	-	-	-	-
Existing Emissions Dust Collection	0.007	0.007	-	-	-	-	-
Existing Emissions Fuel Oil Combustion	1.85	1.85	65.8	0.315	4.63	18.5	0.006
Existing Emissions Natural Gas Combustion	0.244	0.244	0.077	0.706	10.8	12.8	0.242
Total	3.30	3.30	65.9	52.00	15.4	31.3	4.66
Part 70 Threshold Level	N/A	100	100	100	100	100	10/25

This revision to the existing MSOP will **not** change the status of the stationary source because the potential emissions from the entire source will still be less than the Part 70 major source thresholds.

\*Note: Due to the use of different inks and glues, the HAPs emissions have decreased since the issuance of MSOP 107-17679-00060, making it difficult to differentiate HAPs emissions between the existing and proposed scenarios. Therefore, the HAPs emissions stated above for the proposed revision actually represent HAPs emissions for all gluing and inking processes.

### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ, are not included in this permit because the printing presses are flexographic printing presses, not rotogravure printing presses.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.580, Subpart FFF, are not included in this permit because this source is not a rotogravure printing line.
- (c) This source applies coatings to paper. Therefore, the requirements of 40 CFR 60, Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities, are not included in this permit because.
- (d) The source is not a major source of HAPs and does not produce pulp, paper or paperboard. Therefore, the requirements of 40 CFR 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, are not included in this permit.
- (e) This source is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press. Therefore, the requirements of 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, are not included in this permit.
- (f) This source performs only flexographic web printing. Therefore, pursuant to 40 CFR 63.3300(c), 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.

### **State Rule Applicability - Individual Facilities**

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

- (a) Pursuant to 326 IAC 8-2-1(a)(1), the two (2) flexo folder gluers, identified as EG-25 and EG-30, constructed in 1972, are not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because they are located in Montgomery County and were constructed before January 1, 1980.
- (b) This source consists of web coating presses in which one hundred percent (100%) of the paper is coated. Therefore, the printing operations constructed after January 1, 1980, are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations). Pursuant to this rule, the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from the printing presses. The presses will comply with this rule as follows:

The six (6) non heatset flexographic printing presses constructed after 1980 consist of EO-75, EO-93, EG-128, EG-113, EG-114 and EU-013. The worst case coating that will be used at any of these presses contains 7.04 pounds of VOC per gallon of coating less water which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. In order to comply with this limitation, the source will calculate the daily volume weighted average of all coatings applied to each of the six (6) non heatset flexographic printing presses constructed after 1980.

The volume weighted average shall be determined by the following equation:

$$A = [3 (C \times U) / 3 U]$$

Where: A = the volume weighted average in pounds VOC per gallon minus water;  
C = the VOC content of the individual coatings in pounds VOC per gallon minus water; and  
U = the usage rate of the coating in gallons per unit, hour, day or other unit of time

The volume weighted average for all coatings applied at the source is equal to 0.430 pounds VOC per gallon of coating. This calculation is shown on pages pages 3 through 7 of 7 of Appendix A, and is based on 2005 coating usage data supplied by the permittee. The six (6) non heatset flexographic printing presses (EO-75, EO-93, EG-128, EG-113, EG-114 and EU-013) will be able to comply with the VOC content limit of 2.9 pounds of VOC per gallon of coating less water.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the daily volume weighted average, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - L / D)$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating  
= 2.9 pounds VOC per gallon of coating less water  
D = Density of VOC in coating in pounds per gallon of VOC.  
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))  
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied  
E = 4.79 pounds VOC per gallon of coating solids

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

The printing presses at this source are not packaging rotogravure, publication rotogravure or flexographic printing presses. Therefore, the requirements of 326 IAC 8-5-5 are not included in this permit.

### Compliance Requirements

Permits issued under 326 IAC 2-6.1 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 2-6.1. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The source will demonstrate compliance with the VOC content limits of 326 IAC 8-2-5 (Paper Coating Operations) using sales records and VOC data reports supplied by the ink and glue vendor. These records shall be taken and maintained in accordance with (1) through (4) below, and shall be complete and sufficient to establish compliance with the VOC content limit of 326 IAC 8-2-5 (Paper Coating Operations), using the volumetric weighted average methodology. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The volume weighted VOC content of the coatings used for each time frame;
- (3) The total VOC usage for each time frame; and
- (4) The weight of VOCs emitted for each compliance period.

These monitoring conditions are necessary To demonstrate compliance with the VOC content requirements of 326 IAC 8-2-5 and the requirements of 326 IAC 2-6 (MSOP).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

#### Change 1:

The equipment list in Condition A.2 has been revised to reflect the capacity changes for die cutters and gluers EO-75 and EO-93, and flexo folder gluers EG-128, EG-25, EG-113, EG-114, and EG-30, to show the removal of the flexo folder gluer EG-74, and to show the addition of flexo folder gluer EU-013. The revised list is as follows:

#### 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:

- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a**

**maximum page size of 34 by 90 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 94 inches.~~

- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: **1,500 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 80 inches.~~
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: **2,700 sheets per hour, with a maximum page size of 58 by 105 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 64 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 110 inches.~~
- (s) ~~One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (s) **One (1) three-color evol flexo folder gluer, identified as EU-013, approved for construction in 2007, equipped with a flowcoater for glue application, capacity: 5,250 sheets per hour, with a maximum page size of 34 by 83.9 inches.**

## Change 2: Proposed Changes, Sections B and C

- (a) All references to IDEM, OAQ's mailing address have been revised as follows:  
  
The letterhead of the permit has been revised to indicate the new Governor and the new Commissioner of IDEM. The P.O. Box in the address of the OAQ has been deleted throughout the permit and the ZIP code has been revised as follows:  
  
Indiana Department of Environmental Management  
Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015 **46204-2251**
- (b) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.7 – Preventive Maintenance (now B.10).
- (c) In accordance with the requirements of 326 IAC 1-1-6, a condition for Credible Evidence, B.19, has been added to the permit.

- (d) Two (2) new conditions, C.4 Open Burning, and C.5 Incineration have been added to the permit.
- (e) IDEM realizes that the specifications of Condition C.10 - Pressure Gauge and Other Instrument Specifications, can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the language in Condition C.10 (now C.13 Instrument Specifications) has been revised.
- (f) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan (Condition C.11). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, the condition for "Compliance Response Plan" has been replaced by the condition for "Response to Excursions or Exceedances" (Condition C.14). The Section D conditions that refer to this condition have been revised to reflect the new condition title.

The revised conditions are as follows:

**SECTION B ————— GENERAL CONDITIONS**

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.~~

~~B.1 — Permit No Defense [IC 13]~~

~~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 thereunder, as well as other applicable local, state, and federal requirements.~~

~~B.2 — Definitions~~

~~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.3 — Effective Date of the Permit [IC13-15-5-3]~~

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

~~B.4 — Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]~~

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

~~The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

~~B.5 — Modification to Permit [326 IAC 2]~~

~~All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).~~

~~B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

- ~~(a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~
- ~~(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and 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, P.O. Box 6015  
Indianapolis, IN 46206-6015~~

- ~~(d) 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.7 Preventive Maintenance Plan [326 IAC 1-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
  - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
  - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~~~
- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- ~~(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(d) — To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

~~B.8 — Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]~~

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- ~~(a) — Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.~~

- ~~(b) — Any application requesting an amendment or modification of this permit shall be submitted to:~~

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

~~Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.~~

- ~~(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)]~~
- ~~(d) — No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.~~

~~B.9 — 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]  
[IC 13-17-3-2] [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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;~~
- ~~(c) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;~~
- ~~(d) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- ~~(e) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

~~B.10 — Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]~~

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~~Pursuant to [326 IAC 2-6.1-6(d)(3)]:~~

- (a) ~~In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.~~
- (b) ~~The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).~~
- (c) ~~IDEM, OAQ, shall issue a revised permit.~~

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

~~B.11 Annual Fee Payment [326 IAC 2-1.1-7]~~

- (a) ~~The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.~~
- (b) ~~The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.~~

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source
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~~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 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

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

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

~~C.5 Stack Height [326 IAC 1-7]~~

~~The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty five (25) tons per year or more of sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.~~

~~C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

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

All required notifications shall be submitted to:

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

Indianapolis, Indiana 46206-6015

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).~~

~~(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

### ~~C.7 — Performance Testing [326 IAC 3-6]~~

- ~~(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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~no later than thirty-five (35) days prior to the intended test date.~~

- ~~(b) — The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.~~
- ~~(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 the 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.8 — Compliance Requirements [326 IAC 2-1.1-11]**

~~The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.~~

### **C.9 — Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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

### **C.10 — Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- ~~(a) — Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.~~
- ~~(b) — Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.~~
- ~~(c) — The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~
- ~~(d) — The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

### **C.11 — Compliance Response Plan – Preparation and Implementation**

- ~~(a) — The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - ~~(1) — Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
  - ~~(2) — If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~~~
- ~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - ~~(1) — Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~~~

- (2) ~~If none of the reasonable response steps listed in the Compliance Response is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
- (3) ~~If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
- (4) ~~Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- (c) ~~The Permittee is not required to take any further response steps for any of the following reasons:~~
- (1) ~~A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- (2) ~~The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- (3) ~~An automatic measurement was taken when the process was not operating.~~
- (4) ~~The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- (d) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

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

- (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 emissions unit 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 re-testing in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.~~
- (c) ~~IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.~~

~~\_\_\_\_\_ The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

### **Record Keeping and Reporting Requirements**

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

~~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]~~**

- ~~(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 when operation begins.~~

#### **C.15 ~~General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~**

- ~~(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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

- ~~(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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not 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.~~

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

- (a) This permit, 107-17679-00060, 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.3 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.4 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.5 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.6 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.7 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.8 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.9 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, Indiana 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.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to 107-17679-00060 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (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.14 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 permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by 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.15 Source Modification Requirement**

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

**B.16 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, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.17 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.18 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.19 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
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### 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 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]**

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

**C.7 Stack Height [326 IAC 1-7]**

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.9 Performance Testing [326 IAC 3-6]

- (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.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

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

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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.14 Response to Excursions or Exceedances**

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

- (c) **A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
  - (1) **monitoring results;**
  - (2) **review of operation and maintenance procedures and records;**
  - (3) **inspection of the control device, associated capture system, and the process.**
- (d) **Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) **The Permittee shall maintain the following records:**
  - (1) **monitoring data;**
  - (2) **monitor performance data, if applicable; and**
  - (3) **corrective actions taken.**

**C.15 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.16 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.17 General Record Keeping Requirements [326 IAC 2-6.1-5]**

---

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

**C.18 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.**

### Change 3:

IDEM has determined that once per day monitoring of visible emission notations is generally sufficient to ensure proper operation of the baghouse stack exhausts. IDEM has also determined that monitoring this parameter once per day is generally sufficient to ensure proper operation of the emission units and control devices. Therefore, the monitoring frequency has been changed from once per shift to once per day in Conditions D.1.5 (a) and D.2.4 (a). Conditions D.1.5 (e) and D.2.4 (e) have also been changed to be consistent with revised Condition C.14, Response to Excursions or Exceedances.

#### D.1.5 Visible Emissions Notations

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- (a) Visible emission notations from each of the two (2) boilers stack exhaust shall be performed once per **day** shift during normal daylight operations when combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
  
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions are** emission is observed, **the permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan – Preparation and Implementation~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

#### D.2.4 Visible Emissions Notations

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- (a) Visible emission notations of the from the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust shall be performed once per **day** shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions are** emission is observed, **the permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan – Preparation and Implementation~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

### Change 4:

The recordkeeping requirements in Conditions D.1.6 (b) and D.2.10 (a) (now D.2.8 (a)) have been changed to reflect once per day monitoring frequency. The revised conditions are as follows:

#### D.1.6 Record Keeping Requirements

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- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations from each of the two (2) boilers stack exhaust once per **day** shift.

#### D.2.8 ~~D.2.10~~ Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust once per **day** shift.

### Change 5:

IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of emission units and control devices. Therefore, Condition D.2.5 has been changed to require once per day parametric monitoring, and Condition D.2.10 (b) (now D.2.8 (b)) has been changed to require once per day recordkeeping. The revised conditions are as follows:

#### D.2.5 Parametric Monitoring

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The Permittee shall record the ~~total static~~ pressure drop across the baghouse used in conjunction with the one (1) dust collection system, at least once per **day** shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - **Response to Excursions and Exceedances**. ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports.~~ A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - **Response to Excursions and Exceedances** ~~Compliance Response Plan – Preparation and Implementation~~ shall be considered a deviation from this permit.

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

#### D.2.8 ~~D.2.10~~ Record Keeping Requirements

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(b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per **day** shift of the ~~total static~~ pressure drop during normal operation.

### Change 6:

IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, Conditions D.2.6 and D.2.8 requiring control device inspections have been removed from the permit, and all subsequent conditions have been renumbered. In addition, Conditions D.2.10 (c) and (d), the requirement to keep records of the inspections, have been removed.

#### ~~D.2.6 Baghouse Inspections~~

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~~An inspection shall be performed each calendar quarter of all bags controlling the one (1) 99-inch corrugator. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

#### ~~D.2.8 Cyclone Inspections~~

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~~An inspection shall be performed each calendar quarter of the cyclone controlling the one (1) trim waste collection system. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections required by this condition shall not be performed in consecutive months.~~

#### D.2.8 ~~D.2.10~~ Record Keeping Requirements

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(c) ~~To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.8.~~

- (d) ~~To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### Change 7:

A requirement has been added to Condition D.2.3 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition. The revised condition is as follows:

#### D.2.3 Particulate Control

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- (a) In order to comply with Condition D.2.1, the flexo transfer cyclone and baghouse for particulate control shall be in operation and control emissions from the one (1) trim waste collection system and the one (1) 99-inch corrugator at all times that these facilities are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

#### Change 8:

Paragraph (a) of Condition D.2.7 (now D.2.6, Broken or Failed Bag Detection) has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag.

Paragraph (b) of this condition has also been deleted, and two new paragraphs (a) and (b) have been added to the permit to differentiate between those processes that operate in continuous and batch mode. The conditions require an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

#### D.2.6 ~~D.2.7~~ Broken or Failed Bag Detection

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~~In the event that bag failure has been observed:~~

- (a) ~~For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with~~

~~Section C—Compliance Response Plan—Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

- ~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (a) For a single compartment controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.**
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.**

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

#### **Change 9:**

Condition D.2.9 (now D.2.7) has been revised, and paragraphs (a) and (b) have been added to differentiate between those processes that operate in continuous and batch mode. The conditions require an emission unit to be shut down immediately in case of cyclone failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of cyclone failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

#### **D.2.7 D.2.9 Cyclone Failure Detection**

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In the event that cyclone failure has been observed:

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

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.**
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced.**

**The emissions unit shall be shut down no later than the completion of the processing of the material in the line.**

**Change 10:**

The equipment list in Section D.3 has been revised to reflect the capacity changes for die cutters and gluers EO-75 and EO-93, and flexo folder gluers EG-128, EG-25, EG-113, EG-114, and EG-30, to show the removal of the flexo folder gluer EG-74, and to show the addition of flexo folder gluer EU-013.

The revised list is as follows:

### SECTION D.3

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description: Printing and Gluing Operations

- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 62 by 109 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 113 inches.~~
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: **2,000 sheets per hour, with a maximum page size of 34 by 90 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 94 inches.~~
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: **1,500 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 80 inches.~~
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: **2,700 sheets per hour, with a maximum page size of 58 by 105 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 56 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: **10,000 sheets per hour, with a maximum page size of 38 by 64 inches** ~~eight hundred (800) feet per minute with a maximum printing width of 110 inches.~~
- ~~(s) One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.~~
- (s) **One (1) three-color evol flexo folder gluer, identified as EU-013, approved for construction in 2007, equipped with a flowcoater for glue application, capacity: 5,250 sheets per hour, with a maximum page size of 34 by 83.9 inches.**

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

**Change 11:**

Condition D.3.1 has been revised to add evol flexo folder gluer EU-013, and to remove evol flexo folder gluer EG-74. The revised condition is as follows:

**D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-5]**

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Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of 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, from EO-75, EO-93, EG-128, EG-113, EG-114 and **EU-013** ~~EG-74~~.

Compliance with this limitation shall be determined using the volume weighted average method detailed in Condition D.3.4.

**Change 12:**

The source name has been changed from Inland Paperboard and Packaging to **TIN, Inc., d/b/a Temple-Inland** on all reporting forms. The name of the source was previously changed to TIN, Inc., d/b/a Temple-Inland in Notice Only Change 107-20568-00060, issued on February 17, 2005.

**Change 13:**

The IDEM OAQ fax number on all reporting forms has been changed from 317-233-5967 to **317-233-6865**.

**Conclusion**

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 107-23552-00060.

**Appendix A: Emissions Calculations  
VOC Emissions from  
From Printing and Gluing Operations**

**Company Name:** TIN, Inc., d/b/a Temple-Inland  
**Address City IN Zip:** 801 North Englewood Drive, Crawfordsville, IN 47833  
**Permit Number:** SPR 107-23552-00060  
**Pit ID:** 107-00060  
**Reviewer:** Patrick Brennan  
**Application Date:** August 25, 2006

Press ID	Maximum Throughput (sheets/hour)	Maximum Image Size (square inches)	Average Weight % VOC	Maximum Coverage (lbs ink/million sq in)	Throughput (sq in/hour)	VOC Emissions (pounds/hour)	VOC Emissions (tons/year)
EO 75 Ink	2,000	6758.00	1.7600	5.00	13,516,000	1.19	5.21
EO 93 Ink	2,000	6758.00	1.7600	5.00	13,516,000	1.19	5.21
EO 93 Glue	2,000	6758.00	0.9265	1.80	13,516,000	0.23	0.99
EG 128 Ink	2,000	3060.00	1.7600	5.00	6,120,000	0.54	2.36
EG 128 Glue	2,000	3060.00	0.9265	1.80	6,120,000	0.10	0.45
EG 25 Ink	1,500	2128.00	1.7600	5.00	3,192,000	0.28	1.23
EG 25 Glue	1,500	2128.00	0.9265	1.80	3,192,000	0.05	0.23
EG 113 Ink	2,700	6090.00	1.7600	5.00	16,443,000	1.45	6.34
EG 113 Glue	2,700	6090.00	0.9265	1.80	16,443,000	0.27	1.20
EG 114 Ink	10,000	2128.00	1.7600	5.00	21,280,000	1.87	8.20
EG 114 Glue	10,000	2128.00	0.9265	1.80	21,280,000	0.35	1.55
EG 30 Ink	10,000	2432.00	1.7600	5.00	24,320,000	2.14	9.37
EG 30 Glue	10,000	2432.00	0.9265	1.80	24,320,000	0.41	1.78
EU 013 Ink	5,250	2851.24	1.7600	5.00	14,969,010	1.32	5.77
EU 013 Glue	5,250	2851.24	0.9265	1.80	14,969,010	0.25	1.09
<b>Total</b>							<b>50.98</b>

**Note:** The above calculations represent Potential VOC emissions from all printing and gluing operations

**Potential VOC emissions from this modification**

Potential VOC emissions from all printing and gluing operations 50.98 TPY  
 Minus VOC PTE from existing operations (from MSOP 107-17679) 12.76 TPY  
 Net Increase = 38.22 TPY

**METHODOLOGY**

Average Weight Percent VOC is based upon vendor supplied data for calendar year 2005  
 Potential VOC Pounds per Hour = Weight % VOC \* Maximum Coverage (lbs ink/million square inches) \* Throughput (million square inches/hour)  
 Potential VOC Tons per Year = Pounds of VOC per hour \* (8760 hr/yr) \* (1 ton/2000 lbs)

Appendix A: Emission Calculations  
 HAPs Emission Calculations from Printing and Glueing Operations

Company Name: TIN, Inc., db/a Temple-Inland  
 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060  
 Pkt ID: 107-00060  
 Permit Reviewer: Patrick Brennan  
 Application Date: August 25, 2006

Press ID/Material	Maximum Throughput (sheets/hour)	Maximum Image Size (square inches)	Maximum Coverage (lbs ink/million sq in)	Maximum Glue/Ink Usage (pounds/hour)	Maximum Glue/Ink Usage (pounds/year)	Weight % Glycol Ethers	Weight % Vinyl Acetate	Weight % Formaldehyde	Weight % Acetaldehyde	Weight % Methanol	Weight % Dipropylene Glycol	Glycol Ethers Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Acetaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Dipropylene Glycol Emissions (ton/yr)	Total HAPs Emissions (ton/yr)	
EO 75 Ink	2000	6758	5.00	592,001	0.00074	0.00074	0.000000	0.000000	0.000000	0.000000	0.000000	0.2190	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.219
EO 93 Ink	2000	6758	5.00	592,001	0.00074	0.00074	0.000000	0.000000	0.000000	0.000000	0.000000	0.2190	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.219
EO 93 Glue V-3869-RB-001	2000	6758	1.80	24.33	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0446	0.0000	0.0179	0.0892	0.0179	0.0000	0.0000	0.170
EO 93 Glue WB-3131	2000	6758	1.80	24.33	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0417	0.0166	0.0832	0.0339	0.0058	0.0000	0.181
EG 128 Ink	2000	3060	5.00	30.60	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.0892	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.089
EG 128 Glue V-3869-RB-001	2000	3060	1.80	11.02	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0202	0.0000	0.0081	0.0404	0.0081	0.0000	0.0000	0.077
EG 128 Glue WB-3131	2000	3060	1.80	11.02	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0189	0.0075	0.0377	0.0153	0.0026	0.0000	0.082
EG 25 Ink	1500	2128	5.00	15.96	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.0517	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.052
EG 25 Glue V-3869-RB-001	1500	2128	1.80	5.75	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0105	0.0000	0.0042	0.0211	0.0042	0.0000	0.0000	0.040
EG 113 Glue WB-3131	1500	2128	1.80	5.75	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0098	0.0039	0.0197	0.0080	0.0014	0.0000	0.043
EG 113 Ink	2700	6090	5.00	82.22	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.2865	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.286
EG 113 Glue V-3869-RB-001	2700	6090	1.80	29.60	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0543	0.0000	0.0218	0.1085	0.0218	0.0000	0.0000	0.206
EG 113 Glue WB-3131	2700	6090	1.80	29.60	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0507	0.0202	0.1012	0.0412	0.0070	0.0000	0.220
EG 114 Ink	10000	2128	5.00	106.40	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.3449	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.345
EG 114 Glue V-3869-RB-001	10000	2128	1.80	38.30	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0703	0.0000	0.0282	0.1404	0.0282	0.0000	0.0000	0.267
EG 114 Glue WB-3131	10000	2128	1.80	38.30	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0656	0.0262	0.1310	0.0534	0.0091	0.0000	0.285
EG 30 Ink	10000	2432	5.00	121.60	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.3941	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.394
EG 30 Glue V-3869-RB-001	10000	2432	1.80	43.78	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0803	0.0000	0.0322	0.1605	0.0322	0.0000	0.0000	0.305
EG 30 Glue WB-3131	10000	2432	1.80	43.78	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0750	0.0299	0.1497	0.0610	0.0104	0.0000	0.326
EU 013 Ink	5250	2851	5.00	74.85	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.2426	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.243
EU 013 Glue V-3869-RB-001	5250	2851	1.80	26.94	0.000419	0.000419	0.000168	0.000837	0.000168	0.000168	0.000000	0.0494	0.0000	0.0198	0.0988	0.0198	0.0000	0.0000	0.188
EU 013 Glue WB-3131	5250	2851	1.80	26.94	0.000391	0.000391	0.000156	0.000781	0.000156	0.000156	0.000054	0.0000	0.0461	0.0184	0.0922	0.0375	0.0064	0.0000	0.201
<b>Totals</b>												<b>1.837</b>	<b>0.638</b>	<b>0.255</b>	<b>1.274</b>	<b>0.383</b>	<b>0.043</b>	<b>0.000</b>	<b>4.428</b>

METHODOLOGY

HAPS emission rate (tons/yr) = Potential Ink and Glue Usage (pounds/yr) \* Weight % HAP \* 1 ton/2000 lbs

Appendix A: Emissions Calculations

Volumetric Average VOC Calculations from 2005

Company Name: TIN, Inc., dl/b/a Temple-Inland  
 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060

Pit ID: 107-00060

Reviewer: Patrick Brennan

Application Date: August 25, 2006

Material	2005 Annual Ink Usage (pounds)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	2005 Annual Usage Rate (gallons)	Usage Rate (gal) x VOC content (lb/gal less water)
36AW72853 - REFLEX BLUE	2,070	9.00	57.83	54.48	3.35	58.8	37.3	0.73	230.00	168.15
36AWA0304 - NEWTROL BLUE GS	1,350	9.20	52.47	50.99	1.48	56.2	42.0	0.31	146.74	45.63
36AWA0304 - NEWTROL BLUE GS	45	13.80	52.47	50.90	1.57	84.2	13.0	1.37	3.26	4.46
36AWA0821 - NEWTROL REFLEX	1,845	9.20	63.39	61.00	2.39	67.3	29.9	0.67	200.54	134.64
36AWB8825 - PROCESS BLUE CONCENTRATE BASE	450	9.60	46.00	43.91	2.09	50.5	46.8	0.41	46.88	19.00
36BW72851 - BLACK	855	9.00	62.45	58.92	3.53	63.6	32.2	0.87	95.00	82.80
36BWC0315 - BLACK	495	8.90	60.20	59.40	0.80	63.4	35.8	0.19	55.62	10.80
36EW72854 - ORANGE	990	9.30	56.85	50.72	6.13	56.5	36.4	1.31	106.45	139.57
36EWA1346 - NEWTROL ORANGE	945	9.90	55.17	50.46	4.71	59.9	34.1	1.16	95.45	110.91
36GW72868 - GREEN	830	10.50	44.00	43.50	0.50	54.7	44.6	0.12	79.05	9.17
36GWA0822 - NEWTROL GREEN	315	11.12	43.56	41.93	1.63	55.9	41.7	0.41	28.33	11.64
36PW72860 - PURPLE	565	9.30	34.09	33.11	0.98	36.9	62.0	0.14	60.75	8.77
36PW72861 - LT FAST PURPLE	15	9.60	56.00	56.00	0.00	64.4	35.6	0.00	1.56	0.00
36PWA9324 - NEWTROL PURPLE LF	585	9.00	52.32	49.93	2.39	53.9	43.5	0.47	65.00	30.30
36PW60008 - NEWTROL VIOLET RS	45	9.00	58.18	52.90	5.28	57.1	36.6	1.11	5.00	5.53
36RW11433 - BS RED	585	9.86	55.00	52.90	2.10	62.5	34.8	0.55	59.33	32.76
36RW70510 - YS RED	270	9.75	54.00	53.40	0.60	62.4	36.9	0.16	27.69	4.31
36RW72855 - B.S. RED	1,350	9.60	55.00	52.90	2.10	60.9	36.5	0.52	140.63	72.43
36RW72856 - DARK RED	540	9.20	60.25	54.56	5.69	60.2	33.2	1.31	58.70	77.10
36RW72857 - Y.S. RED	1,530	9.60	55.29	53.71	1.58	61.8	36.2	0.40	159.38	63.27
36RW72858 - BS MAGENTA	90	0.98	59.40	59.40	0.00	7.0	93.0	0.00	91.84	0.00
36RW72859 - YS MAGENTA	180	9.60	57.00	57.00	0.00	65.6	34.4	0.00	18.75	0.00
36RW72864 - IRON OXIDE RED	135	12.20	45.95	42.67	3.28	62.4	32.3	1.06	11.07	11.77
36RW97091 - Y/S NAPHTHOL RED BASE	340	8.50	45.00	44.10	0.90	44.9	54.1	0.14	40.00	5.56
36RW99744 - NEWTROL OXIDE RED	180	12.50	47.02	44.38	2.64	66.5	29.2	0.98	14.40	14.18
36RWA0305 - NEWTROL RED 2BS	1,665	9.75	55.01	53.50	1.51	62.5	35.6	0.39	170.77	67.06
36RWA0537 - NEWTROL NAPHTHOL YS	45	9.32	54.66	52.68	1.98	58.8	38.7	0.45	4.83	2.16
36RWA1347 - NEWTROL RUBINE	945	9.75	57.22	55.92	1.30	65.3	33.0	0.37	96.92	35.43
36RWA9325 - NEWTROL CA LITHOL	720	9.00	53.19	50.27	2.92	54.2	42.5	0.57	80.00	45.92
36RWB7968 - NEWTROL BS RHODAMINE	45	9.00	48.07	46.27	1.80	49.9	48.0	0.32	5.00	1.62
36RWC0349 - NEWTROL MAGENTA YS	180	9.00	55.00	55.00	0.00	59.3	40.7	0.00	20.00	0.00
36WWW2850 - WHITE	14,100	13.40	29.66	27.57	2.09	44.3	51.9	0.50	1052.24	528.78
36WWW93245 - NEWTROL WHITE	8,430	13.80	33.26	31.66	1.60	52.4	44.7	0.46	610.87	283.12
36YW72862 - YELLOW	7,200	9.20	55.63	50.00	5.63	55.1	38.4	1.15	782.61	903.41
36YW72863 - OPAQUE YELLOW	495	11.80	48.20	45.31	2.89	64.1	31.4	0.95	41.95	39.81
36YW99743 - NEWTROL OXIDE YELLOW	450	12.50	48.15	45.42	2.73	68.0	27.5	1.07	36.00	38.43
36YWA0102 - NEWTROL YELLOW	3,295	12.50	56.44	52.91	3.53	79.3	15.2	2.13	263.60	560.55

Volumetric Average VOC Calculations

Company Name: TIN, Inc., d/b/a Temple-Inland  
 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060  
 Pkt ID: 107-00060  
 Reviewer: Patrick Brennan  
 Application Date: August 25, 2006

Material	2005 Annual Ink Usage (pounds)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	2005 Annual Usage Rate (gallons)	Usage Rate (gal) x VOC content (lb/gal less water)
7EAW42525 - HG GCMi: 30 BLUE MK NK	4,320	11.60	38.51	36.71	1.80	51.0	46.3	0.43	372.41	158.79
7EAW42526 - HG GCMi 31 BLUE MK NK	25,650	11.50	36.93	35.54	1.39	49.0	49.0	0.31	2230.43	698.81
7EAW42528 - HG-9 GCMi 33 BLUE MK NK	2,025	11.40	39.94	38.24	1.70	52.2	45.2	0.41	177.63	72.08
7EAW42530 - HG GCMi: 387 BLUE MK NK	3,420	11.40	34.70	33.04	1.66	45.1	52.4	0.34	300.00	103.49
7EAW42532 - HG GCMi: 3086 BLUE MK NK	2,250	11.40	36.25	34.44	1.81	47.1	50.3	0.39	197.37	76.91
7EAW42605 - HG-9 GCMi 39 BLUE MK NK	18,150	11.60	37.59	36.21	1.38	50.3	47.6	0.32	1564.66	504.27
7EAW42610 - HG GCMi: 300 BLUE MK NK	1,125	11.70	36.67	34.90	1.77	48.9	48.4	0.41	96.15	38.99
7EAW42611 - HG GCMi 394 BLUE MK NK	8,010	11.70	36.32	34.89	1.43	48.9	48.9	0.33	684.62	224.24
7EAW42630 - HG GCMi: 3229 BLUE MK NK	450	11.80	36.56	34.82	1.74	49.2	48.1	0.40	38.14	15.43
7EAW59728 - HG SPEC LC GCMi 39 BLUE	21,060	11.60	38.52	37.11	1.41	51.6	46.3	0.34	1815.52	613.40
7EAW60344 - HG LC AB 03282 BLUE NK	6,390	11.50	39.46	37.97	1.49	52.3	45.5	0.36	555.65	199.69
7EAW92222 - HG PROCESS U BLUE MK	1,350	11.40	35.29	33.51	1.78	45.8	51.6	0.37	118.42	44.32
7EAW92703 - HG PROCESS U CYAN MK	450	11.70	34.76	33.09	1.67	46.4	51.1	0.36	38.46	14.02
7EAWB7914 - HG P-288U BLUE ON #3W	135	11.50	40.24	38.82	1.42	53.5	44.4	0.35	11.74	4.12
7EAWC4115 - HG PRIORITY MAIL BLUE MK	1,170	11.80	36.43	34.92	1.51	49.4	48.3	0.35	99.15	34.89
7EAWC6835 - NEWTROL GCMi 30 BLUE MK NK	900	9.00	39.90	38.21	1.69	41.2	56.8	0.26	100.00	25.87
7EAWC6836 - NEWTROL GCMi 31 BLUE MK NK	3,940	9.00	39.11	37.37	1.74	40.3	57.7	0.26	437.78	114.83
7EAWC6838 - NEWTROL GCMi 33 BLUE MK NK	2,790	9.00	40.45	38.72	1.73	41.8	56.2	0.27	310.00	82.88
7EAWC6841 - NEWTROL GCMi 39 BLUE MK NK	10,080	9.00	40.50	38.72	1.78	41.8	56.2	0.28	1120.00	308.08
7EAWC6855 - NEWTROL GCMi 300 BLUE MK NK	270	9.00	38.98	37.37	1.61	40.3	57.8	0.24	30.00	7.28
7EAWC6856 - NEWTROL GCMi 387 BLUE MK NK	1,395	9.00	38.14	36.42	1.72	39.3	58.7	0.25	155.00	39.52
7EAWC6857 - NEWTROL GCMi 388 BLUE MK NK	450	9.00	37.46	35.74	1.72	38.6	59.5	0.25	50.00	12.60
7EAWC6858 - NEWTROL LC GCMi 394 BLUE MK NK	3,960	9.00	36.32	34.94	1.38	37.7	60.7	0.20	440.00	87.69
7EAWC6863 - NEWTROL GCMi 3086 BLUE MK NK	3,240	9.00	38.69	36.99	1.70	39.9	58.2	0.25	360.00	91.63
7EAWC6865 - NEWTROL GCMi 3229 BLUE MK NK	675	9.00	38.30	36.57	1.73	39.4	58.6	0.26	75.00	19.28
7EAWC8420 - NEWTROL AB 03282 BLUE NK	270	9.00	45.28	42.95	2.33	46.3	51.1	0.39	30.00	11.72
7EAWC8440 - NEWTROL PRIORITY MAIL BLUE	135	9.00	42.54	39.97	2.57	43.1	54.0	0.41	15.00	6.10
7EAWC9817 - NEWTROL REFLEX U BLUE NK	135	9.00	42.25	39.95	2.30	43.1	54.3	0.36	15.00	5.46
7EAWC9819 - NEWTROL PANTONE REFLEX U BLUE	405	9.00	43.26	40.71	2.55	43.9	53.3	0.41	45.00	18.41
7EAWC9857 - HG GCMi 31 BLUE NK MK	450	12.20	40.70	39.07	1.63	57.1	40.3	0.46	36.89	17.11
7EAWC9957 - NEWTROL ARMSTRONG BLUE MK	180	9.00	38.28	36.52	1.76	39.4	58.6	0.26	20.00	5.23
7EAWD1267 - NEWTROL 31 BLUE MK NK	450	9.00	36.22	34.82	1.40	37.6	60.8	0.20	50.00	10.09
7EBW10748 - HYDRO BUSCH 9309 BLACK	1,755	8.10	58.95	54.41	4.54	52.8	42.4	0.78	216.67	168.84
7EBW42519 - HYDRO GCMi 90 BLACK	176,900	8.90	70.80	69.00	1.80	73.6	24.5	0.61	19876.40	12056.80
7EBW71449 - BOX II BLACK	2,250	8.90	59.09	56.86	2.23	60.6	36.7	0.50	252.81	127.48
7EBW72019 - HI DENSITY BLENDING BLACK	1,350	9.30	64.24	61.29	2.95	68.3	28.2	0.87	145.16	125.67
7EBW87260 - HYDRO 87260 BREWERY BLACK	900	8.50	57.82	55.51	2.31	56.5	40.9	0.45	105.88	47.84
7EEWA2608 - HG GCMi: 81 ORANGE MK NK	225	11.20	38.28	36.63	1.65	49.2	48.4	0.36	20.09	7.30
7EEWC0560 - HG PANTONE 142U ORANGE MK	135	12.20	35.43	33.55	1.88	49.1	48.0	0.45	11.07	4.98

Volumetric Average VOC Calculations

Company Name: TIN, Inc., d/b/a Temple-Inland  
 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060  
 Plt ID: 107-00060  
 Reviewer: Patrick Brennan  
 Application Date: August 25, 2006

Material	2005 Annual Ink Usage (pounds)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	2005 Annual Usage Rate (gallons)	Usage Rate (gal) x VOC content (lb/gal less water)
7EEWC6851 - NEWTROL GCM1 80 ORANGE MK NK	810	9.00	40.99	39.01	1.98	42.1	55.7	0.31	90.00	27.69
7EEWC6852 - NEWTROL GCM1 81 ORANGE MK NK	90	9.00	40.92	38.90	2.02	42.0	55.7	0.31	10.00	3.13
7EEWC9943 - NEWTROL PANTONE 172U ORANGE MK	135	9.00	40.05	37.78	2.27	40.7	56.6	0.34	15.00	5.17
7EEWC9944 - NEWTROL PANTONE 123U ORANGE MK	90	9.00	39.62	37.62	2.00	40.6	57.1	0.30	10.00	3.03
7EEWC9945 - NEWTROL PANTONE 159U ORANGE MK	90	9.00	41.40	39.36	2.04	42.5	55.2	0.32	10.00	3.19
7EEWD0458 - HG SP 1235U ORANGE NK	2,250	11.60	38.40	36.60	1.80	50.9	46.4	0.42	193.97	82.43
7EEWD0537 - NEWTROL SP 1235U ORANGE NK	1,080	9.00	40.62	38.40	2.22	41.4	56.0	0.34	120.00	40.92
7EFW52596 - HG PMS SP 874 GOLD	360	10.30	44.23	39.29	4.94	48.5	45.3	0.99	34.95	34.53
7EGW42522 - HG GCM1: 20 GREEN MK NK	3,510	11.30	38.96	37.23	1.73	50.4	47.0	0.39	310.62	122.45
7EGW42523 - HG GCM1 21 GREEN MK NK	6,350	11.20	38.10	36.40	1.70	48.9	48.7	0.37	566.96	211.05
7EGW42524 - HG GCM1 24 GREEN MK NK	1,350	11.40	39.51	38.14	1.37	52.1	45.9	0.33	118.42	38.62
7EGW42603 - HG GCM1 25 GREEN MK NK	1,350	11.40	38.58	36.73	1.85	50.2	47.1	0.42	118.42	50.13
7EGW42604 - HG GCM1: 29 GREEN MK NK	1,350	11.40	39.88	38.23	1.65	52.2	45.3	0.39	118.42	46.62
7EGWA0493 - HG PANTONE 3298U GREEN MK BK	540	11.80	36.32	34.72	1.60	49.1	48.5	0.37	45.76	16.97
7EGWC0747 - HG PAPAS GREEN 2004 NK	16,740	11.50	46.28	44.19	2.09	60.9	35.9	0.61	1455.65	894.80
7EGWC3430 - NEWTROL PAPA JOHN GREEN NK	67,680	9.00	49.01	47.40	1.61	51.1	47.0	0.30	7520.00	2229.23
7EGWC6830 - NEWTROL GCM1 20 GREEN MK NK	1,665	9.00	40.45	38.55	1.90	41.6	56.2	0.29	185.00	54.14
7EGWC6831 - NEWTROL GCM1 21 GREEN MK NK	2,800	9.00	39.34	37.51	1.83	40.5	57.5	0.28	311.11	86.06
7EGWC6832 - NEWTROL GCM1 24 GREEN MK NK	855	9.00	40.36	38.50	1.86	41.5	56.3	0.29	95.00	27.20
7EGWC6833 - NEWTROL GCM1 25 GREEN MK NK	405	9.00	40.11	38.22	1.89	41.2	56.6	0.29	45.00	13.02
7EGWC6834 - NEWTROL GCM1 29 GREEN MK NK	270	9.00	40.07	38.14	1.93	41.1	56.7	0.30	30.00	8.85
7EGWC9574 - NEWTROL PAPA JOHN LR GREEN NK	90	9.00	58.97	58.67	0.30	63.3	36.4	0.07	10.00	0.74
7EGWC9958 - NEWTROL ARMSTRONG GREEN MK	180	9.00	41.94	39.88	2.06	43.0	54.6	0.33	20.00	6.51
7EKW09614 - CLEAR EXTENDER	450	8.70	54.20	48.66	5.54	50.7	42.9	0.98	51.72	50.60
7EKW69208 - HG H/G EXTENDER	4,540	8.90	52.81	49.88	2.93	53.2	43.3	0.56	510.11	284.24
7EKWA5789 - HG FILLED EXTENDER	52,400	11.68	34.49	33.57	0.92	47.0	51.6	0.20	4486.30	909.58
7EKWA6040 - WB ANTI-SKID COR COATING	720	9.10	48.52	47.35	1.17	51.6	47.0	0.22	79.12	17.42
7EKWC7800 - NEWTROL EXTENDER C	31,040	9.00	36.96	35.18	1.78	37.9	60.0	0.26	3448.89	890.29
7ENWA2534 - HG GCM1: 52 BROWN MK NK	10,890	11.40	41.29	39.53	1.76	54.0	43.4	0.44	955.26	416.66
7ENWC6844 - NEWTROL GCM1 52 BROWN MK NK	2,520	9.00	39.91	38.29	1.62	41.3	56.8	0.25	280.00	69.54
7ENWC9941 - NEWTROL PANTONE 505U BROWN MK	90	9.00	38.34	36.51	1.83	39.4	58.5	0.27	10.00	2.72
7EPW42606 - HYG-8 GCM1 40 PURPLE MBN	270	11.00	39.02	37.85	1.17	49.9	48.5	0.26	24.55	6.30
7EPW48960 - HG PM 60195 PURPLE CWK	225	11.80	37.55	36.01	1.54	50.9	46.7	0.37	19.07	7.06
7EPW90807 - HG PMS 251U PURPLE MK	135	11.80	34.35	32.64	1.71	46.2	51.2	0.37	11.44	4.29
7EPWB0921 - HG 2602C PURPLE NK	225	12.60	38.05	35.99	2.06	54.3	42.2	0.57	17.86	10.15
7EPWB1960 - HG PANTONE U VIOLET MK	135	12.40	35.94	34.32	1.62	51.0	46.4	0.41	10.89	4.46
7EPWC6842 - NEWTROL GCM1 49 PURPLE MK NK	675	9.00	39.07	37.34	1.73	40.3	57.7	0.26	75.00	19.55
7EPWC7888 - HG PANTONE 247U PURPLE MK	135	11.90	35.02	33.34	1.68	47.5	49.9	0.38	11.34	4.32
7ERWA2535 - HG GCM1: 73 RED MK NK	1,575	11.40	39.36	37.71	1.65	51.5	46.0	0.39	138.16	53.60

Volumetric Average VOC Calculations

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 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060  
 Plt ID: 107-00060  
 Reviewer: Patrick Brennan  
 Application Date: August 25, 2006

Material	2005 Annual Ink Usage (pounds)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	2005 Annual Usage Rate (gallons)	Usage Rate (gal) x VOC content (lb/gal less water)
7ERW42536 - HG GCM1 74 RED MK NK	16,650	10.90	38.05	36.50	1.55	47.7	50.1	0.32	1527.52	493.26
7ERW42537 - HG-9 GCM1 75 RED MK NK	23,300	10.90	39.09	37.56	1.53	49.1	48.8	0.33	2137.61	699.69
7ERW42538 - HG GCM1 76 RED MK NK	25,200	11.40	39.83	38.41	1.42	52.5	45.4	0.34	2210.53	752.87
7ERW42615 - HG GCM1 609 MAROON MK NK	1,350	11.40	38.24	36.78	1.46	50.3	47.6	0.33	118.42	39.62
7ERW49105 - HG 49105 RED CWK	225	10.80	43.38	42.43	0.95	54.9	43.7	0.23	20.83	4.74
7ERW54488 - HG A.BUSCH 07201 RED NK	1,710	11.10	42.00	41.11	0.89	54.7	44.0	0.22	154.05	33.59
7ERW56497 - HG JDCC HURRICANE PUNCH	225	9.00	56.83	54.96	1.87	59.3	38.5	0.41	25.00	10.33
7ERWA2328 - HG PMS 207U RED MK	135	11.70	37.74	35.74	2.00	50.1	46.8	0.47	11.54	5.41
7ERWC0748 - HG PAPAS RED 2004 NK	7,830	11.20	38.55	37.09	1.46	49.8	48.1	0.33	699.11	227.63
7ERWC3429 - NEWTROL PAPA JOHN RED NK	31,275	9.00	42.16	40.09	2.07	43.2	54.5	0.33	3475.00	1140.38
7ERWC6845 - NEWTROL GCM1 73 RED MK NK	1,080	9.00	41.17	39.32	1.85	42.4	55.5	0.29	120.00	34.69
7ERWC6846 - NEWTROL GCM1 74 RED MK NK	6,245	9.00	42.44	40.86	1.58	44.1	54.1	0.25	693.89	176.42
7ERWC6847 - NEWTROL GCM1 75 RED MK NK	10,665	9.00	41.84	40.14	1.70	43.3	54.8	0.27	1185.00	319.71
7ERWC6848 - NEWTROL GCM1 76 RED MK NK	6,525	9.00	39.83	38.44	1.39	41.5	56.9	0.21	725.00	154.93
7ERWC6860 - NEWTROL GCM1 609 RED MK NK	405	9.00	42.50	40.60	1.90	43.8	54.0	0.30	45.00	13.69
7ERWC9227 - HG GCM1 74 RED MK NK	450	10.90	41.45	39.96	1.49	52.2	45.7	0.34	41.28	14.03
7ERWC9911 - NEWTROL PANTONE 200U RED NK	180	9.00	39.78	37.99	1.79	41.0	57.0	0.27	20.00	5.46
7ERWC9956 - NEWTROL ARMSTRONG RED MK	180	9.00	44.45	42.55	1.90	45.9	51.9	0.32	20.00	6.32
7ERWD0305 - HG MIKES HARD CRANBERRY RED MK	180	9.20	55.43	53.29	2.14	58.8	38.6	0.48	19.57	9.34
7ERWD0306 - HG MIKES HARD BERRY RED MK	180	9.40	52.49	50.70	1.79	57.1	40.7	0.39	19.15	7.51
7ERWD0593 - NEWTROL GCM1 74 RED MK NK	90	9.00	42.67	40.74	1.93	43.9	53.9	0.31	10.00	3.10
7ERWD1173 - NEWTROL GCM1 75 RED MK NK	1,125	9.00	38.89	37.66	1.23	40.6	58.0	0.19	125.00	23.30
7ERWD1266 - NEWTROL GCM1 74 RED MK NK	450	9.00	38.05	36.53	1.52	39.4	58.8	0.23	50.00	11.29
7EWW74779 - HIGH OPACITY WHITE	4,320	15.00	39.42	39.09	0.33	70.3	29.1	0.17	288.00	47.95
7EWW74805 - GCM1 91 WHITE	4,770	12.30	43.74	43.38	0.36	63.9	35.5	0.12	387.80	47.62
7EYW41047 - HG SEAGRAMS 41047 YELLOW	2,025	8.60	37.25	35.95	1.30	37.1	61.5	0.18	235.47	41.82
7EYW42521 - HG GCM1: 10 YELLOW MK NK	2,835	11.40	36.65	35.00	1.65	47.8	49.7	0.36	248.68	89.63
7EYW42601 - HYG-8 GCM1 11 YELLOW MBN	900	11.60	38.08	36.65	1.43	51.0	46.9	0.34	77.59	26.24
7EYW49110 - HG 49110 YELLOW	450	8.50	53.64	50.94	2.70	51.9	45.1	0.48	52.94	25.25
7EYWB0737 - HG 606U YELLOW MK	135	11.40	36.87	35.10	1.77	48.0	49.4	0.39	11.84	4.59
7EYWC6828 - NEWTROL GCM1 10 YELLOW MK NK	2,160	9.00	40.23	38.31	1.92	41.3	56.5	0.29	240.00	70.67
7EYWC6829 - NEWTROL GCM1 13 YELLOW MK NK	1,215	9.00	39.71	37.84	1.87	40.8	57.0	0.28	135.00	38.39
7EYWC6854 - NEWTROL GCM1 103 YELLOW MK NK	1,620	9.00	40.01	38.03	1.98	41.0	56.7	0.30	180.00	54.38
7EYWC6866 - NEWTROL GCM1 11 YELLOW MK NK	945	9.00	40.78	38.67	2.11	41.7	55.9	0.33	105.00	34.21
7EYWD0307 - HG MIKES HARD LEMONADE	180	8.80	55.09	52.54	2.55	55.4	41.6	0.50	20.45	10.29
7LXW11188 - HK-THICKENER	100	8.80	82.00	13.00	69.00	13.7	16.3	7.04	11.36	79.96
7MHW12297 - ROLL CLEANER	90	8.70	92.00	90.00	2.00	93.8	4.1	2.82	10.34	29.17
7MKW08755 - H-50 WAX COMPOUND	120	8.30	54.11	53.96	0.15	53.7	46.2	0.03	14.46	0.39
7MKW69135 - NEWTROL CLEAR EXTENDER	495	8.70	55.91	55.91	0.00	58.3	41.7	0.00	56.90	0.00

Volumetric Average VOC Calculations

Company Name: TIN, Inc., d/b/a Temple-Inland  
 Address City IN Zip: 801 North Englewood Drive, Crawfordsville, IN 47833  
 Permit Number: SPR 107-23552-00060  
 Plt ID: 107-00060  
 Reviewer: Patrick Brennan  
 Application Date: August 25, 2006

Material	2005 Annual Ink Usage (pounds)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	2005 Annual Usage Rate (gallons)	Usage Rate (gal) x VOC content (lb/gal less water)
7MKW90258 - WAX EMULSION	625	8.17	60.00	60.00	0.00	58.7	41.3	0.00	76.50	0.00
7MKWD2425 - NEWTROL FILM VEHICLE	135	9.00	60.00	59.63	0.37	64.3	35.3	0.09	15.00	1.40
9MKW72002 - HYDRO PROCESS PH ADJUSTER	1,295	8.40	77.48	46.81	30.67	47.1	18.3	4.87	154.17	751.09
<b>Total</b>	<b>739,500</b>								<b>74,563</b>	<b>32,073</b>

Volume Weighted Average VOC content (lb/gallon less water) =  $\Sigma(\text{Usage Rate (gallons)} \times \text{VOC content (lb/gallon less water)}) / \Sigma \text{Gallons}$   
 Volume Weighted Average VOC content (lb/gallon less water) = **0.430**

METHODOLOGY

2005 Annual Ink Usage supplied by Tin, Inc. from vendor data  
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

