



TO: Interested Parties / Applicant

RE: TIN Inc., dba Temple-Inland / M097-24870-00314

FROM: Felicia A. Robinson  
Administrator  
City of Indianapolis  
Office of Environmental Services

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)



Certified Mail: 7000 0600 0023 5187 0472

June 25, 2007

Rick Wheeler  
TIN Inc. dba Temple Inland  
2135 Stout Field Drive East  
Indianapolis, IN 46241

Re: 097-24870-00314  
Fourth Notice Only Change to  
MSOP Number: 097-14600-00314

Dear Mr. Wheeler:

TIN Inc. dba Temple Inland, located at 2135 Stout Field Drive East, Indianapolis, Indiana 46241, was issued a Minor Source Operating Permit, 097-14600-00314, on September 26, 2003 for the operation of a stationary paperboard production plant. A First Notice Only Change [097-18227-00314] was issued on October 31, 2003. A Second Notice Only Change [097-18930-00314] was issued on September 3, 2004. A Third Notice Only Change [097-23222-00314] was issued on June 23, 2006. A First Minor Permit Revision [097-22963-00314] was issued on August 25, 2006. On May 9, 2007 an application was received requesting that a new Automaton Label Applicator (Emission Unit 024) be installed to replace two existing Label Applicators (Automaton label laminators identified as Emission Units 018 and 022).

The new Automaton Label Applicator will employ the same process for affixing the labels to the corrugated paper as the two units that will be removed, including the same raw materials, adhesives and solvent containing materials. The potential to emit, of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) (as defined in 326 IAC 2-7-1(29)) will be less after the removal of the existing label applicators and installation of the new Automaton Label Applicator (see calculations as Attachment A). The new Automaton Label Applicator will comply with the same applicable requirements as the previously installed equipment and will not trigger any new applicable requirements. Therefore, pursuant to the provisions of 326 IAC 2-6.1-6(d)(13), this modification request will be processed as a Notice Only Change.

Pursuant to the provisions of 326 IAC 2-6.1-6(d) and (e) (Notice-Only changes), the permit is hereby revised as follows (the bold language is new language that has been added, and the language with a line through it has been taken out):

- 1. IDEM, OAQ, and OES will no longer be listing the name or title of the Authorized Individual (A.I.) in the permit. Permit condition A.1 has been revised as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]  
The Permittee owns and operates a stationary paperboard production plant.

~~Authorized Individual:~~ **Plant Manager**  
Source Address: 2135 Stout Field Drive East, Indianapolis, Indiana 46241  
Mailing Address: 2135 Stout Field Drive East, Indianapolis, Indiana 46241

...



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Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
indygov.org/dpw

2. The descriptions in Condition A.2 and Section D.2 have been updated, to account for the removal of the two existing label machines and the addition of the new Automaton Label Applicator, as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

...

- (k) ~~Two (2) Automaton label laminators, identified as emission units EU-018 and EU-022, installed in 1994 and 2006 respectively, with a maximum operating capacity of 6,000 and 7,000 sheets per hour respectively, both exhausting inside the building.~~  
**One (1) Automaton Label Applicator, identified as emission unit EU-024, installed in May, 2007, with a maximum operating capacity of 3,000 sheets per hour, exhausting inside the building.**

...

**SECTION D.2 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-6.1]:

- (h) Three (3) Jagenberg, J&L and Post specialty folder gluers, identified as EU-011, EU-012, and EU-013, installed in 1998, 1994, and 2001 respectively, with a collective maximum glue usage of 179.75 pounds per hour, using no controls, and exhausting inside the building.
- (j) One (1) corn-based starch silo, identified as EU-017, installed in 1999, with a maximum annual capacity for starch throughput of 2,000 tons per year, controlled by a baghouse, and exhausting to stack S-004.
- (k) ~~Two (2) Automaton label laminators, identified as emission units EU-018 and EU-022, installed in 1994 and 2006 respectively, with a maximum operating capacity of 6,000 and 7,000 sheets per hour respectively, both exhausting inside the building.~~  
**One (1) Automaton Label Applicator, identified as emission unit EU-024, installed in May, 2007, with a maximum operating capacity of 3,000 sheets per hour, exhausting inside the building.**
- (l) Two (2) International Speed King tapers, identified as EU-019 and EU-023, installed in 2001 and 2006 respectively, each with a maximum operating capacity of 15,000 sheets per hour, each with emissions below 1 ton per year (tpy) and exhausting inside the building.
- (m) One (1) Heritage Crystal Clean small parts washer, identified as EU-020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, and exhausting inside the building.

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

3. Upon further review, IDEM, OAQ, and OES have decided to include the following updates to further address and clarify the permit term and the term of the conditions. This includes the addition of the conditions: Term of Conditions, Termination of Right to Operate and Permit Renewal; and changes to the following conditions: Definitions, Permit Term, Annual Notification, Transfer of Ownership or Operation, Permit Renewal and Performance Testing.

IDEM, OAQ, and OES have rearranged and renumbered some of the conditions as well as adding new ones. The cover page and various permit conditions have been revised as follows:

(herein known as the Permittee) is hereby authorized to **construct and** operate subject to the conditions contained herein, the emission units 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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

...

## 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 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.~~

### ~~B.1 B.2 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, M097-14600-00314, 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 and OES, 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~~ ~~Effective Date of the Permit [40 CFR 124]~~

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~~Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, this permit will become effective immediately upon its issuance if no comments requested a change in the draft permit. If a comment is received which requests a change, the effective date of this permit will be thirty (30) days after the service of notice of the decision. If the final day of the thirty (30) day time period falls on a weekend or legal holiday, the time period shall be extended to the next working day.~~

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

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~~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.7~~ ~~B.6~~ ~~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) 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:~~

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251~~

~~and~~

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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, and OES on or before the date it is due.

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**B.14 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 and OES, 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, and OES 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.~~

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251**

**and**

**Office of Environmental Services  
Administration Building  
2700 South Belmont Ave.  
Indianapolis, IN 46221**

**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.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 OES 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services  
Administration Building  
2700 South Belmont Ave.  
Indianapolis, IN 46221

- (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, and OES 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 and OES 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 and OES any additional information identified as being needed to process the application.

#### C.5 Performance Testing [326 IAC 3-6]

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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  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 and OES of the actual test date at least fourteen (14 days) prior to the actual 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).**

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#### D.4.2 Reporting Requirements

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- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the **"authorized individual"** ~~"responsible official"~~ as defined by **326 IAC 2-1.1-1(1)** ~~326 IAC 2-7-1(34)~~.

4. The mailing address for IDEM, has been updated throughout the permit as follows:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-52 IGCN 1003**  
Indianapolis, Indiana 46204-2251

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

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 Jeffrey Hege at (317) 327-2279.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Administrator  
Office of Environmental Services

Attachments: Revised Permit and Attachment A

FAR / jh

cc: File  
Air Compliance – Matt Mosier  
IDEM, OAQ – Mindy Hahn  
US EPA Region 5  
Marion County Health Dept.



**MINOR SOURCE OPERATING PERMIT  
INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
CITY OF INDIANAPOLIS  
OFFICE OF ENVIRONMENTAL SERVICES**

**TIN Inc., dba Temple-Inland  
2135 Stout Field Drive East  
Indianapolis, Indiana 46241**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units 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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-14600-00314	
ORIGINAL SIGNED BY	Issuance Date: September 26, 2003
John B. Chavez, Administrator Office of Environmental Services City of Indianapolis	Expiration Date: September 26, 2008

1 <sup>st</sup> Notice Only Change: 097-18227-00314	Issuance Date: October 31, 2003
2 <sup>nd</sup> Notice Only Change: 097-18930-00314	Issuance Date: September 3, 2004
3 <sup>rd</sup> Notice Only Change: 097-23222-00314	Issuance Date: June 23, 2006
1 <sup>st</sup> Minor Permit Revision: 097-22963-00314	Issuance Date: August 25, 2006

4 <sup>th</sup> Notice Only Change: 097-24870-00314	Conditions Modified: A.1, A.2, B.1, B.2, B.3, B.6, B.10, B.12, B.13, C.5, D.2, D.4.2.
ORIGINAL SIGNED BY	Issuance Date: June 25, 2007
Felicia A. Robinson, Administrator Office of Environmental Services	Expiration Date: September 26, 2008



Air Quality Hotline: 317-327-4AIR | knozone.com

**Department of Public Works  
Office of Environmental Services**

2700 Belmont Avenue Indianapolis, IN 46221	317-327-2234 Fax 327-2274 TDD 327-5186 indygov.org/dpw
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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) and Indianapolis Office of Environmental Services (OES). 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 stationary paperboard production plant.

Source Address:	2135 Stout Field Drive East, Indianapolis, Indiana 46241
Mailing Address:	2135 Stout Field Drive East, Indianapolis, Indiana 46241
General Source Phone:	(317) 390-3300
SIC Code:	2653
County Location:	Marion County
Source Location Status:	Nonattainment for Ozone under the 8-hr standard; and Nonattainment for PM-2.5; Attainment for all other criteria pollutants.
Source Status:	Minor Source, under PSD, Emission Offset Rules, and Nonattainment New Source Review.

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

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) Peters, Single Star paperboard corrugator, identified as emission unit 001 (EU-001), installed in 1989, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone to collect trim paper, identified as 015, installed in 1989, and exhausting to stack S-002.
- (b) One (1) Cuir, Mark II six (6) color flexographic printing press, identified as EU-002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting inside the building.
- (c) One (1) Saturn II two (2) color flexographic printing press, identified as EU-003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting inside the building.
- (d) One (1) Ward, two (2) color rotary die cutter, identified as EU-004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone to collect trim paper, identified as 015, and exhausting to stack S-002.
- (e) One (1) McKinley, two (2) color rotary die cutter, identified as EU-006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone to collect trim paper, identified as 014, and exhausting to stack S-002.
- (f) One (1) United four (4) color rotary die cutter, identified as EU-007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone to collect trim paper, identified as 014, and exhausting to stack S-002.
- (g) Two (2) Bobst platen die cutters, identified as EU-008 and EU-009, installed in 1994 and 2000 respectively, each with a maximum operating capacity of 10,000 sheets per hour, using a cyclone to collect trim paper, identified as 015, and exhausting to stack S-002.

- (h) Three (3) Jagenberg, J&L and Post specialty folder gluers, identified as EU-011, EU-012, and EU-013, installed in 1998, 1994, and 2001 respectively, with a collective maximum glue usage of 179.75 pounds per hour, using no controls, and exhausting inside the building.
- (i) One (1) Cleaver Brooks natural gas fired boiler, identified as EU-016, installed in 1988, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack S-003.
- (j) One (1) corn-based starch silo, identified as EU-017, installed in 1999, with a maximum annual capacity for starch throughput of 2,000 tons per year, controlled by a baghouse, and exhausting to stack S-004.
- (k) One (1) Automaton Label Applicator, identified as emission unit EU-024, installed in May, 2007, with a maximum operating capacity of 3,000 sheets per hour, exhausting inside the building.
- (l) Two (2) International Speed King tapers, identified as EU-019 and EU-023, installed in 2001 and 2006 respectively, each with a maximum operating capacity of 15,000 sheets per hour, each with emissions below 1 ton per year (tpy) and exhausting inside the building.
- (m) One (1) Heritage Crystal Clean small parts washer, identified as EU-020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, exhausting inside the building.

## 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)]

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- (a) This permit, M097-14600-00314, 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 and OES, 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 Modification to Permit [326 IAC 2]

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction 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.5 Local Agency Requirement

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An application for an operation permit must be made ninety (90) days before start up to:

City of Indianapolis  
Office of Environmental Services (OES)  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The operation permit issued by OES shall contain as a minimum the conditions in the Operation Conditions section of this permit.

### B.6 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) 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 be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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, and OES 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

- (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 PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP 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]

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 nonroad 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 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, or OES, or 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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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services  
Administration Building  
2700 South Belmont Ave.  
Indianapolis, IN 46221

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

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: 317-327-2234 (ask for OES Air Compliance), to determine the appropriate permit fee.

**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 OES 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services  
Administration Building  
2700 South Belmont Ave.  
Indianapolis, IN 46221

- (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, and OES 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 and OES 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 and OES any additional information identified as being needed to process the application.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

**C.1 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 and OES, the fact that continuance of this permit is not consistent with purposes of this article.

**C.2 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 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.4 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  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Enforcement Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

##### **C.5 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 and OES of the actual test date at least fourteen (14) days) prior to the actual 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, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the source submits to IDEM, OAQ, and OES 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.6 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.7 Compliance Monitoring [326 IAC 2-1.1-11]**

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

##### **C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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

### C.9 Compliance Response Plan - Preparation and Implementation

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- (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, and the City of Indianapolis, OES 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 Plan 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, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of 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.

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

### **C.10 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 OES 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 and OES, 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.11 General Record Keeping Requirements [326 IAC 2-6.1-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the City of Indianapolis, OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the City of Indianapolis, OES 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.12 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

City of Indianapolis  
Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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, and the City of Indianapolis, OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do 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 D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (a) One (1) Peters, Single Star paperboard corrugator, identified as emission unit 001 (EU-001), installed in 1989, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone to collect trim paper, identified as 015, installed in 1989, and exhausting to stack S-002.

(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 Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the paperboard corrugator shall be limited by the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour  
and P = process weight rate in tons per hour

The process weight rate for the corrugator is 21.3 tons per hour. Therefore, the allowable rate of emission in pounds per hour is 31.8 pounds per hour. The source is in compliance with a potential to emit 17.0 pounds per hour.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]:**

- (h) Three (3) Jagenberg, J&L and Post specialty folder gluers, identified as EU-011, EU-012, and EU-013, installed in 1998, 1994, and 2001 respectively, with a collective maximum glue usage of 179.75 pounds per hour, using no controls, and exhausting inside the building.
- (j) One (1) corn-based starch silo, identified as EU-017, installed in 1999, with a maximum annual capacity for starch throughput of 2,000 tons per year, controlled by a baghouse, and exhausting to stack S-004.
- (k) One (1) Automaton Label Applicator, identified as emission unit EU-024, installed in May, 2007, with a maximum operating capacity of 3,000 sheets per hour, exhausting inside the building.
- (l) Two (2) International Speed King tapers, identified as EU-019 and EU-023, installed in 2001 and 2006 respectively, each with a maximum operating capacity of 15,000 sheets per hour, each with emissions below 1 ton per year (tpy) and exhausting inside the building.
- (m) One (1) Heritage Crystal Clean small parts washer, identified as EU-020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, and exhausting inside the building.

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

### SECTION D.3

### FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-6.1]:**

- (b) One (1) Cuir, Mark II six (6) color flexographic printing press, identified as EU-002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting inside the building.
- (c) One (1) Saturn II two (2) color flexographic printing press, identified as EU-003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting inside the building.
- (d) One (1) Ward, two (2) color rotary die cutter, identified as EU-004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone to collect trim paper, identified as 015, and exhausting to stack S-002.
- (e) One (1) McKinley, two (2) color rotary die cutter, identified as EU-006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone to collect trim paper, identified as 014, and exhausting to stack S-002.
- (f) One (1) United four (4) color rotary die cutter, identified as EU-007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone to collect trim paper, identified as 014, and exhausting to stack S-002.
- (g) Two (2) Bobst platen die cutters, identified as EU-008 and EU-009, installed in 1994 and 2000 respectively, each with a maximum operating capacity of 10,000 sheets per hour, using a cyclone to collect trim paper, identified as 015, and exhausting to stack S-002.

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

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (i) One (1) Cleaver Brooks natural gas fired boiler, identified as EU-016, installed in 1988, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack S-003.

(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.4.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2]

Pursuant to 326 IAC 6-2-1(d), particulate emissions from indirect heating facilities shall be limited by the following equation:

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

Where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input of boiler.

Therefore, particulate emissions from the natural gas fired boiler shall not exceed 0.54 pounds per million Btu (lbs/MMBtu).

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

#### D.4.2 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OES  
AIR COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: TIN Inc., dba Temple-Inland  
Source Address: 2135 Stout Field Drive East, Indianapolis, Indiana 46241  
Mailing Address: 2135 Stout Field Drive East, Indianapolis, Indiana 46241  
MSOP Number: M097-14600-00314

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Notification
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
AIR COMPLIANCE**

**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., dba Temple-Inland</b>
<b>Address:</b>	<b>2135 Stout Field Drive East</b>
<b>City:</b>	<b>Indianapolis, Indiana 46202</b>
<b>Phone #:</b>	<b>(317) 390-3300</b>
<b>MSOP #:</b>	<b>097-14600-00314</b>

I hereby certify that TIN Inc., dba Temple-Inland is      still in operation.      no longer in operation. I hereby certify that  
TIN Inc., dba Temple-Inland is:  
    in compliance with the requirements of MSOP 097-14600-00314.  
    not in compliance with the requirements of MSOP 097-14600-00314.

<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  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
FAX NUMBER - (317) 327-2274**

PAGE 1 of 1

**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: \_\_\_\_\_

PAGE 2 OF 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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**Attachment A: Emissions Calculations  
Glue Applicators**

Company Name: TIN Inc. dba Temple-Inland  
Address City IN Zip : 2135 Stout Field Drive East, Indianapolis, Indiana 46241  
MSOP : 097-14600-00314  
4th Notice Only Change : 097-24870-00314  
Reviewer: Jeffrey Hege

**REMOVED**

<b>THROUGHPUT</b>						
Press ID	Max Sheets Per Hour	Max Image Size (in x in)	MMin <sup>2</sup> /Year	MMin <sup>3</sup> /hr		
<b>Automaton EU-018</b>	6,000	54 78	221,383	25		
WB-1164						
<b>PTE's for VOC's</b>	Maximum Coverage* (lbs/MMin <sup>2</sup> )	Weight % VOC**	Flash Off %	Throughput MMin <sup>3</sup> /hr	Pounds of Glue	EMISSIONS (TONS/YEAR)
Glues	50	0.1740%	100.00%	221,383	11,069,136.00	9.6301
<b>PTE's for HAP's</b>						
Inks: <i>NO INKS USED</i>						
Glues						
WB-1164	Contains NO HAPS					

<b>THROUGHPUT</b>						
Press ID	Max Sheets Per Hour	Max Image Size (in x in)	MMin <sup>2</sup> /Year	MMin <sup>3</sup> /hr		
<b>Automaton EU-022</b>	7,000	54 78	258,280	29		
WB-1164						
<b>PTE's for VOC's</b>	Maximum Coverage* (lbs/MMin <sup>2</sup> )	Weight % VOC**	Flash Off %	Throughput MMin <sup>3</sup> /hr	Pounds of Glue	EMISSIONS (TONS/YEAR)
Glues	50	0.1740%	100.00%	258,280	12,913,992.00	11.2352
<b>PTE's for HAP's</b>						
Inks: <i>NO INKS USED</i>						
Glues						
WB-1164	Contains NO HAPS					

**METHODOLOGY**

**Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year**  
VOC (ton/yr)= Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput in MMin<sup>2</sup> per hr \* 1 Ton per 2000 lb.  
HAP (ton/yr)= Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage HAP (water minus organics) \* Flash off \* Throughput in MMin<sup>2</sup> per hour \* 1 Ton per 2000 lb.  
Note 1: Total emissions based on rated capacity at 8,760 hours/year. \*Maximum hourly usage based on data from 2004 operations as provided by the source.  
Note 2: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.  
Note 3: All run speeds are calculated at full coverage, which is 25% of Max. Operating Capacity.

**ADDED**

<b>THROUGHPUT</b>						
Press ID	Max Sheets Per Hour	Max Image Size (in x in)	MMin <sup>2</sup> /Year	MMin <sup>3</sup> /hr		
<b>Automaton EU-024</b>	3,000	40 80	84,096	10		
WB-1164						
<b>PTE's for VOC's</b>	Maximum Coverage* (lbs/MMin <sup>2</sup> )	Weight % VOC**	Flash Off %	Throughput MMin <sup>3</sup> /hr	Pounds of Glue	EMISSIONS (TONS/YEAR)
Glues	50	0.1740%	100.00%	84,096	4,204,800.00	3.6582
<b>PTE's for HAP's</b>						
Inks: <i>NO INKS USED</i>						
Glues						
WB-1164	Contains NO HAPS					
<b>METHODOLOGY</b>						
<b>Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin<sup>2</sup> per Year</b>						
VOC (ton/yr)= Maximum Coverage pounds per MMin <sup>2</sup> * Weight percentage volatiles (water minus organics) * Flash off * Throughput in MMin <sup>2</sup> per hr * 1 Ton per 2000 lb.						
HAP (ton/yr)= Maximum Coverage pounds per MMin <sup>2</sup> * Weight percentage HAP (water minus organics) * Flash off * Throughput in MMin <sup>2</sup> per hour * 1 Ton per 2000 lb.						
Note 1: Total emissions based on rated capacity at 8,760 hours/year. *Maximum hourly usage based on data from 2004 operations as provided by the source.						
Note 2: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.						
Note 3: All run speeds are calculated at full coverage, which is 25% of Max. Operating Capacity.						

**Attachment A: Uncontrolled (PTE) Emissions Calculations  
Particulate Emissions**

TSD Attachment A, page 2 of 3

**Company Name: TIN Inc., dba Temple Inland  
Address City IN Zip: 2135 Stout Field Drive East, Indianapolis, IN 46241  
Permit Number: MSOP 097-14600-00314  
4th Notice Only Change : 097-24870-00314  
Reviewed & Verified by : Jeffrey Hege**

Unit	Process	Units processed		Unit Weight lbs / sf (174 lbs/mmsf)	Maximum Throughput		PM Emission Factor (lb/ton)	Uncontrolled PM Emissions (ton/yr)	Uncontrolled PM- 10 Emissions (ton/yr)
					lb/hr	ton/yr			
EU-001	Corrugator *a	130,000,000	sf/hr	0.0001740	22.62000	99.076	0.006	0.39000	
EU-002	Cuir Press *b	No PM							
EU-003	Satum II	180,556	sq.ft/hr	0.0001740	31.41667	137.605		0.00000	
EU-004	Ward	183,333	sq.ft/hr	0.0001740	31.90000	139.722		0.00000	
EU-006	McKinley	310,000	sq.ft/hr	0.0001740	53.94000	236.257		0.00000	
EU-007	United	258,958	sq.ft/hr	0.0001740	45.05875	197.357		0.00000	
EU-008	Bobst	175,000	sq.ft/hr	0.0001740	30.45000	133.371		0.00000	
EU-009	Bobst	175,000	sq.ft/hr	0.0001740	30.45000	133.371		0.00000	
EU-011	Jagenberg	277,778	sq.ft/hr	0.0001740	48.33333	211.700		0.00000	
EU-012	J & L	311,040	sq.ft/hr	0.0001740	54.12096	237.050		0.00000	
EU-013	Post	444,444	sq.ft/hr	0.0001740	77.33333	338.720		0.00000	
EU-016	Cleaver Brooks Boiler	* d							
EU-017	Starch Silo *c	4,000,000	lbs/yr	1.00	456.621	2,000.000	0.18	0.18000	0.18000
EU-019	Speed King (Int'l Taper) *b	No PM					0	0.00000	
EU-020	Parts Washer * b	No PM					0	0.00000	
EU-023	Speed King Taper *b	No PM					0	0.00000	
<b>EU - 024</b>	<b>Automaton * b</b>	<b>No PM</b>					<b>0</b>	<b>0.00000</b>	
	<b>TOTAL</b>							<b>0.57000</b>	<b>0.18000</b>

\*a - EU-001 Emission based upon msf, not on weight. Emission factor is industry specific and as provided by source.

\*b - EU-002, EU-019, EU-020, EU-023 and EU-024 have no PM Emissions

\*c - EU-017 emission factor is as specified below in c).

**METHODOLOGY**

**1) Throughput:**

a) Maximum Throughput (EU-003 through EU-013) in ton/yr = pieces cut (sq.ft per hour) x 8760 hr/yr x 174 lb/1,000,000 sq.ft x 1ton/2000 lb

b) EU-014 and EU-1015 are in lbs/hr, therefore there is no weight conversion.

c) EU-017 is based upon potential at the silo in lbs/yr

- Emission factor for EU-017 is based upon AP-42, Chapter 9.9.1, Table 9.9.1-1 particulate emission factors for grain elevators, SCC 3-02-005-51 for grain loading.

**2) Uncontrolled Particulate Matter (PM) Emissions:**

a) Uncontrolled PM Emissions (ton/yr) = Maximum Throughput (ton/yr) \* PM Emission Factor (lb/ton) / 2000 (lb/ton)

**Attachment A: Uncontrolled (PTE) Emissions Calculations  
VOC and HAP Emissions**

**Company Name:** TIN Inc., d/b/a Temple Inland  
**Address City IN Zip:** 2135 Stout Field Drive East, Indianapolis, IN 46241  
**Permit Number:** M097-14600-00314  
**4th Notice Only Change :** 097-24870-00314  
**Reviewed & Verified by :** Jeffrey Hege

Unit	Process	Maximum Throughput		Uncontrolled VOC Content (%)	Emission Factor	Uncontrolled Total VOC Emissions (ton/yr)	Uncontrolled Total HAP Emissions (ton/yr)	Uncontrolled Highest Single HAP (glycol ethers*) ton/yr
		(lb/hr)	(ton/yr)					
EU-002	Cuir Press	43.68	191.3184	1.99%	0.0199	3.8095	0.5931	0.5931
EU-003	Saturn II	87.768	384.4238	1.99%	0.0199	7.6546	1.1917	1.1917
	- Gluing	31.59648	138.3926	0.9265%	0.009265	1.2822	0.2261	
EU-004	Ward	47.12	206.3856	1.99%	0.0199	4.10955	0.6398	0.6398
	- Gluing	16.9632	74.2988	0.9265%	0.009265	0.6884	0.1214	
EU-006	McKinley	65.1	285.1380	1.99%	0.0199	5.6777	0.8839	0.8839
	- Gluing	23.436	102.6497	0.9265%	0.009265	0.9510	0.1677	
EU-007	United	91.233	399.6005	1.99%	0.0199	7.9568	1.2388	1.2388
	- Gluing	32.84388	143.8562	0.9265%	0.009265	1.3328	0.2351	
EU-011	Jagenberg							
	- Gluing	72	315.36	0.9265%	0.009265	2.9218	0.5153	
EU-012	J & L							
	- Gluing	80.622	353.122	0.9265%	0.009265	3.2717	0.5770	
EU-013	Post							
	- Gluing	72	315.36	0.9265%	0.009265	2.9218	0.5153	
EU-019	International Taper	No VOCs				0.0000		
EU-023	International (Speed King) Taper	No VOCs	34.0589					
	- Gluing					0.0000	0.04942	
<b>EU-024</b>	<b>Automaton gluer</b>	<b>0.835</b>	<b>3.6582</b>	<b>0.174%</b>	<b>0.174</b>	<b>3.6582</b>	<b>0.00000</b>	
EU-020	Parts Washer					0.0049275	0.04681	
	<b>TOTAL</b>					<b>46.2411</b>	<b>7.0014</b>	<b>4.5473</b>

\*Note: Manufacturer % content of Glycol ethers is proprietary and could not be obtained or verified by the source, therefore they could not be taken off the HAP list (EPA removed glycol ethers with CAS No. 111-76-2 of the HAP list on November 29, 2004, 69FR69320). Therefore, glycol ethers were counted in the HAP calculations.

**1) Emission Factors:**

- a) VOC & HAP emission factors are industry specific and as provided by the source and manufacturer.
- b) Emission factors for EU-011, EU-012, and EU-013 are based upon worst possible case for glue.
  - facility uses three glues, emission factor is for the highest VOC content glue, not necessarily the glue that will be used.
- c) Emission Units EU-018 and EU-022 use glue WB-1164

**2) Uncontrolled VOC Emissions**

- a) Total VOC Emissions (ton/yr) = Maximum Throughput (ton/yr) x Emission Factor
- b) Total HAP Emissions (ton/yr) = Maximum Throughput (ton/yr) x Emission Factor