



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 24, 2010

RE: Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverage/ 143-29809-00020

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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Mr. Scott DeVries
Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Company
1402 SR 256
Austin, IN 47102

November 24, 2010

Re: Exempt Construction and Operation Status,
143-29809-00020

Dear Mr. DeVries:

The application from Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Company, received on October 19, 2010, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary soft drink manufacturing and bottling plant located at 1402 SR 256, Austin, IN is classified as exempt from air pollution permit requirements:

- (a) One (1) natural gas-fired boiler, identified as U01, constructed in 1979, with a maximum heat input capacity of 13.39 MMBtu/hr, and exhausting to Stack S01.

The following conditions shall be applicable:

1. 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (a) Opacity shall not exceed an average of forty percent (40%) 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.
2. 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
3. 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) the particulate emissions from boiler U01 shall be limited to 0.6 pounds per MMBtu heat input.

This exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Charles Sullivan OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-232-8422 or at 1-800-451-6027 (ext 2-8422).

Sincerely,



Alfred C. Dumauai, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and calculations

ACD/cbs

cc: File - Scott County
Scott County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Company
Source Location:	1402 SR 256, Austin, IN 47102
County:	Scott
SIC Code:	2086
Exemption No.:	143-29809-00020
Permit Reviewer:	Charles Sullivan

On October 19, 2010, the Office of Air Quality (OAQ) received an application from Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Company related to the operation of a stationary soft drink manufacturing and bottling plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Scott County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Scott County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants
 Scott County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Company on October 19, 2010, relating to the operation of a stationary soft drink manufacturing and bottling plant.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit:

- (a) One (1) natural gas-fired boiler, identified as U01, constructed in 1979, with a maximum heat input capacity of 13.39 MMBtu/hr, and exhausting to Stack S01.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								Worst Single HAP
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	
Natural Gas Combustion Boiler U01	0.11	0.45	0.45	0.04	5.9	0.3	4.9	0.111	0.106 (Hexane)
Total PTE of Entire Source	0.11	0.45	0.45	0.04	5.9	0.3	4.9	0.111	
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **- PM2.5 emission factor uses PM10 as a surrogate

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 (40 CFR 60.40, Subpart D), are not included in the permit for the boiler, since the boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (b) The requirements of the New Source Performance Standards for Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (40 CFR 60.40Da, Subpart Da), are not included in the permit for the boiler, since the boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (c) The requirements of the New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40b, Subpart Db), are not included in the permit for the boiler, since the boiler is rated at less than one hundred (100) MMBtu per hour.
- (d) The requirements of the New Source Performance Standard for Small Industrial - Commercial - Institutional Steam Generator Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the boiler, since the boiler was constructed prior to June 9, 1989 applicability date.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
 - (2) 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

State Rule Applicability – Boiler U01

- (h) 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

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

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) (13.39)

N = number of stacks (1)

a = plume rise factor (0.67)

h = stack height (ft) (31)

Year Constructed	Unit Descriptions	Q (MMBtu/hr)	Pt (lb/MMBtu)	C (u/m ³)	N (#stacks)	a (pl r.f.)	h (ft.)
1979	Boiler U01	13.39	1.93	50	1	0.67	31

However, pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 mmBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/mmBtu heat input. Therefore, the particulate emissions from boiler U01 shall not exceed 0.6 pounds per MMBtu heat input.

Using the emission factors and heating values provided, the following conclusions can be made:

$$\begin{aligned} \text{Particulate Matter (PM) Emissions} &= 1.9 \text{ lb PM/MM SCF} \times \text{MM SCF} / 1,020 \text{ MMBtu} \\ &= 0.0019 \text{ lbs/MMBtu} \end{aligned}$$

The 0.0019 lbs/MMBtu emission rate estimated using the AP-42 emission factor is less than the 0.6 lb/MMBtu limit. Therefore, the boiler is able to comply with 326 IAC 6-2-3.

Conclusion and Recommendation

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 October 19, 2010.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 143-29809-00020. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8422 or toll free at 1-800-451-6027 extension (2-8422).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Pepsi-Cola Bottlers KY, LLC dba Pepsi Beverages Co.
Address City IN Zip: 1402 SR 456 Austin, IN 47102
Permit Number: 143-29809-00020
Reviewer: C. Sullivan
Date: 10/25/2010

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.39

117.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.11	0.45	0.04	5.9	0.3	4.9

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 2 TSD App A for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Pepsi-Cola Bottlers KY, LLC dba Pepsi Beverages Co.
Address City IN Zip: 1402 SR 456 Austin, IN 47102
Permit Number: 143-29809-00020
Reviewer: C. Sullivan
Date: 10/25/2010

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.232E-04	7.038E-05	4.399E-03	0.106	1.994E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.932E-05	6.451E-05	8.211E-05	2.229E-05	1.232E-04

Methodology is the same as page 1.

PTE of Total HAPs (tons/year) 0.111

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Scott DeVries
Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beve
1402 SR 256
Austin, IN 47102

DATE: November 24, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Exemption
143-29809-00020

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 11/24/2010 Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beverages Co 143-29809-00020		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	

CERTIFICATE OF MAILING ONLY

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Scott DeVries Pepsi-Cola General Bottlers KY, LLC dba Pepsi Beve 1402 SR 256 Austin IN 47102 (Source CAATS)										
2		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 (Health Department)										
3		Austin Town Council 80 W. Main St. Austin IN 47102 (Local Official)										
4		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)										
5		Kevin Craig Strata Environmental 110 Perimeter Park, Suite E Knoxville TN 37922 (Consultant)										
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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