



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: September 9, 2011

RE: Hazen Paper Company / 137-30462-00022

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

## Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M137-30462-00022	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 9, 2011  Expiration Date: September 9, 2021

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary specialty paper manufacturer.

Source Address:	604 Railroad Ave, Osgood, Indiana 47037
General Source Phone Number:	(812) 689-6502
SIC Code:	2672
County Location:	Ripley
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) laminator, identified as L6, constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural gas-fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hr, exhausting to stacks SL6-D1, SL6-D2. The coating and adhesive are applied by roll coating before the paper is laminated; this is done in line by a web-coating operation.
- (b) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hr, exhausting to stack SCB-1;
- (c) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hr, exhausting to stack SCB-2;
- (d) Five (5) existing natural gas-fired space heaters, identified as R1 through R5, constructed in 2001, with a maximum heat input of 0.2 MMBtu/hr each, exhausting to stacks SR-1 through SR-5;
- (e) One (1) Hurst natural gas-fired boiler, identified as H1, constructed in 2006, with a maximum heat input of 1.25 MMBtu/hr, exhausting to stack SH-1;
- (f) Three (3) natural gas-fired space heaters, identified as C1 through C3, constructed in 2006, with a total maximum heat input of 3.5 MMBtu;
- (g) One (1) cold cleaning degreasing operation, identified as PW-1, constructed in 2006, with a maximum capacity of 0.055 gal/day; and
- (h) One (1) maintenance and grinding operation, constructed in 2006, control by dust collector DC1, exhausting to stack SDC-1, with a maximum air flow of 5,300 cfm.

## 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, M137-30462-00022, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

### B.4 Enforceability

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

### B.5 Severability

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M137-30462-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requièrent**

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

**B.15 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.18 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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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.12 Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps**

#### **C.13 Response to Excursions or Exceedances**

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Upon detecting an excursion where a response steps is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

#### **C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

#### **C.15 Malfunctions Report [326 IAC 1-6-2]**

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

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

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

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

#### **C.17 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
  
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) laminator, identified as L6, constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural gas-fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hr, exhausting to stacks SL6-D1, SL6-D2. The coating and adhesive are applied by roll coating before the paper is laminated; this is done in line by a web-coating operation.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) Limitations (Paper Coating Operations) [326 IAC 8-2-5]

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the one (1) laminator, identified as L6. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IACC 8-1-4]

Compliance with the VOC content limits contained in Condition D.1.1, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulations data supplied by the coating manufacture. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.1.4 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1 through 2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by the condition.

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

<b>Emissions Unit Description:</b>	
(b)	One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hr, exhausting to stack SCB-1;
(c)	One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hr, exhausting to stack SCB-2;
(d)	Five (5) existing natural gas-fired space heaters, identified as R1 through R5, constructed in 2001, with a maximum heat input of 0.2 MMBtu/hr each, exhausting to stacks SR-1 through SR-5;
(e)	One (1) Hurst natural gas-fired boiler, identified as H1, constructed in 2006, with a maximum heat input of 1.25 MMBtu/hr, exhausting to stack SH-1;
(f)	Three (3) natural gas-fired space heaters, identified as C1 through C3, constructed in 2006, with a total maximum heat input of 3.5 MMBtu;
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

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

**D.2.1 Particulate Emission Limitations [326 IAC 6-2]**

- (a) Pursuant to 326 IAC 6-2-3(d), the Cleaver Brooks boilers (CB-1 and CB-2) shall in no case exceed 0.8 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a), particulate emissions from the following indirect heating units shall be limited to the following:

Type of Unit	Maximum Heat Input Capacity (MMBtu/hr)	Q	Pt	Construction Date
Boiler H1	1.25	10.47 + 1.25 = 11.72	0.57	2006

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
- Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

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

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

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

##### D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

##### D.3.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications

where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) Other systems demonstrated equivalent control such as a refrigerated chiller or carbon absorption. Such systems shall be submitted to the U. S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Hazen Paper Company
<b>Address:</b>	604 Railroad Ave
<b>City:</b>	Osgood, Indiana 47037
<b>Phone #:</b>	(812) 689-6502
<b>MSOP #:</b>	M137-30462-00022

I hereby certify that Hazen Paper Company is :

still in operation.

no longer in operation.

I hereby certify that Hazen Paper Company is :

in compliance with the requirements of MSOP M137-30462-00022.

not in compliance with the requirements of MSOP M137-30462-00022.

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

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

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

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

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

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

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

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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**Indiana Department of Environmental Management**  
Office of Air Quality

Technical Support Document (TSD) for a  
Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	Hazen Paper Company
<b>Source Location:</b>	604 Railroad Ave, Osgood, Indiana 47037
<b>County:</b>	Ripley
<b>SIC Code:</b>	2672 (Coated and Laminated Paper, Not Elsewhere Classified)
<b>Permit Renewal No.:</b>	M137-30462-00022
<b>Permit Reviewer:</b>	Marcia Earl

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Hazen Paper Company relating to the operation of a stationary specialty paper manufacturing operation. On April 20, 2011, Hazen Paper Company submitted an application to the OAQ requesting to renew its operating permit. Hazen Paper Company was issued an MSOP M137-23025-00022 on August 31, 2006.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) laminator, identified as L6, constructed in 2006, with a maximum capacity of 1,000 ft/min, exhausting to one (1) ozone and one (1) steam stack, with two (2) natural gas-fired Maxon oven packs for two (2) drying chambers, identified as L6D1 and L6D2, each with a maximum heat input of 3.45 MMBtu/hr each, exhausting to stacks SL6-D1, SL6-D2. The coating and adhesive are applied by roll coating before the paper is laminated; this is done in line by a web-coating operation.
- (b) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hr, exhausting to stack SCB-1;
- (c) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hr, exhausting to stack SCB-2;
- (d) Five (5) existing natural gas-fired space heaters, identified as R1 through R5, constructed in 2001, with a maximum heat input of 0.2 MMBtu/hr each, exhausting to stacks SR-1 through SR-5;
- (e) One (1) Hurst natural gas-fired boiler, identified as H1, constructed in 2006, with a maximum heat input of 1.25 MMBtu/hr, exhausting to stack SH-1;
- (f) Three (3) natural gas-fired space heaters, identified as C1 through C3, constructed in 2006, with a total maximum heat input of 3.5 MMBtu;
- (g) One (1) cold cleaning degreasing operation, identified as PW-1, constructed in 2006, with a maximum capacity of 0.055 gal/day; and
- (h) One (1) maintenance and grinding operation, constructed in 2006, control by dust collector DC1, exhausting to stack SDC-1, with a maximum air flow of 5,300 cfm.

### Existing Approvals

Since the issuance of the MSOP M137-23025-00022 on August 31, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. 137-24564-00022, issued May 3, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Ripley County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>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 PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Ripley County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

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

**Fugitive Emissions**

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	0.38
PM <sub>10</sub>	0.94
PM <sub>2.5</sub>	0.94
SO <sub>2</sub>	0.06
NO <sub>x</sub>	9.92
VOC	81.14
CO	8.34
CO <sub>2</sub> e	11,981

HAPs	tons/year
Hexane	0.18
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	negligible
<b>Total</b>	<b>0.19</b>

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, VOC's are equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Coating Application	0.00	0.00	0.00	0.00	0.00	68.66	0.00	0.00	0.00	0.00
Adhesive Application	0.00	0.00	0.00	0.00	0.00	11.86	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.19	0.75	0.75	0.06	9.92	0.55	8.34	11,981	0.19	0.18 Hexane
Degreasing Operation	0.00	0.00	0.00	0.00	0.00	6.83E-02	0.00	0.00	0.00	0.00
Grinding Operation	0.19	0.19	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>0.38</b>	<b>0.94</b>	<b>0.94</b>	<b>0.06</b>	<b>9.92</b>	<b>81.14</b>	<b>8.34</b>	<b>11,981</b>	<b>0.19</b>	<b>0.18 Hexane</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	10	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *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". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for CO <sub>2</sub> e in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than one hundred (100) tons per year, and it is in one of the twenty-eight (28) listed source categories.

**Federal Rule Applicability**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D (60.40 through 60.46) (326 IAC 12), are not included in the permit, because:
- (1) the two (2) Cleaver Brooks boilers (CB-1 and CB-2) were constructed before August 17, 1971 and have a heat input rating of less than 250 MMBtu/hr;
  - (2) the five (5) natural gas-fired space heaters (R1 through R5) are not steam generating units;
  - (3) the one (1) Hurst natural gas-fired boiler has a maximum heat input rating of less than 250 MMBtu/hr; and

- (4) the three (3) natural gas-fired space heaters (C1 through C3) are not steam generating units.
- (b) The requirements of the New Source Performance Standard Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da (60.40da through 60.52da) (326 IAC 12), are not included in this permit, because:
- (1) the two (2) Cleaver Brooks boilers (CB-1 and CB-2) were constructed before September 18, 1978 and have a heat input rating of less than 250 MMBtu/hr;
  - (2) the five (5) natural gas-fired space heaters (R1 through R5) are not steam generating units;
  - (3) the one (1) Hurst natural gas-fired boiler has a maximum heat input rating of less than 250 MMBtu/hr; and
  - (4) the three (3) natural gas-fired space heaters (C1 through C3) are not steam generating units.
- (c) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (60.40b through 60.49b) (326 IAC 12), are not included in this permit, because:
- (1) the two (2) Cleaver Brooks boilers (CB-1 and CB-2) were constructed before June 19, 1984 and have a heat input rating of less than 100 MMBtu/hr;
  - (2) the five (5) natural gas-fired space heaters (R1 through R5) are not steam generating units;
  - (3) the one (1) Hurst natural gas-fired boiler has a maximum heat input rating of less than 100 MMBtu/hr; and
  - (4) the three (3) natural gas-fired space heaters (C1 through C3) are not steam generating units.
- (d) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (60.40c through 60.48c) (326 IAC 12), are not included in this permit, because:
- (1) the two (2) Cleaver Brooks boilers (CB-1 and CB-2) were constructed before June 9, 1989 and have a heat input rating of less than 100 MMBtu/hr and less than 10 MMBtu/hr;
  - (2) the five (5) natural gas-fired space heaters (R1 through R5) are not steam generating units;
  - (3) the one (1) Hurst natural gas-fired boiler has a maximum heat input rating of less than 10 MMBtu/hr; and
  - (4) the three (3) natural gas-fired space heaters (C1 through C3) are not steam generating units.
- (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) The requirements for the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 to 63.471) (326 IAC 20-6), are not included in this permit for the cold cleaning degreasing operation, identified as PW1, because the source does not use solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these HAPs, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- (g) The requirements for the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (63.820 to 63.839) (326 IAC 20-18), are not included in this permit, because this source is not a major source of HAPs and does not operate any publication rotogravure, product and packing rotogravure or wide-web flexographic presses.
- (h) The requirements for the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coatings, 40 CFR 63, Subpart JJJJ (63.3280 to 63.3420) (326 IAC 20-65), are not included in this permit. This source has a web-coating operation but, is not a major source of HAPs
- (i) The requirements for the National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO (63.4280 to 63.4371) (326 IAC 20-77), are not included in this permit, because the source is not a major source of HAPs and does not include any printing, coating, and dyeing of fabrics and other textiles.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit for the natural gas-fired boilers, space heaters, and Maxon oven packs, because this source is not a major source of HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the natural gas-fired boilers, because each unit is a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

- (m) 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.

<b>State Rule Applicability - Entire Source</b>
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326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

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

### 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.

### 326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

<b>State Rule Applicability – Individual Facilities</b>
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### Coating, Adhesive and Lamination Operations

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

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

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Pursuant to 326 IAC 8-1-6 new facilities as of January 1, 1980 that have the potential emission of twenty-five (25) tons or more per year are located anywhere in the state and are not otherwise regulated by other provisions of this article are subject to 326 IAC 8-1-6 (VOC Rules: General Reduction Requirement for New Facilities). The laminating operation, identified as L6, is not subject to the requirements of 326 IAC 8-1-6 since it is subject to the provisions of 326 IAC 8-2-5 (Paper Coating Operations).

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

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990, located in any county, and with potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The laminating operation, identified as L6, which was constructed in 2006, is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations), since it has potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 8-2-5(b), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line.

The coating line uses a coating with a VOC content of 0.72 pounds of VOC per gallon less water and the adhesive line uses a coating with a VOC content of 0.10 pounds of VOC per gallon less water. Therefore the lamination operation (L6) can comply with this requirement.

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

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

Boilers and Space Heaters

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

- (a) The Cleaver Brooks natural gas-fired boilers, identified as CB1 and CB2, are subject to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(C), because the facilities are sources of indirect heating that were constructed prior to June 8, 1972.

Type of Unit	Maximum Heat Input Capacity (MMBtu/hr)	Construction Date
Boiler CB-1	6.28	1961
Boiler CB-2	4.19	1967

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

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

where

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

Pt = emission rate limit (lbs/MMBtu)

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

N = number of stacks (2)

a = plume rise factor (0.67)

h = stack height (26.8 ft)

$$Pt = 1.69 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(d), particulate emissions from any facility used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds per MMBtu heat input. Therefore, pursuant to 326 IAC 6-2-3(d), the Cleaver Brooks boilers (CB-1 and CB-2) shall in no case exceed 0.8 pounds per MMBtu heat input.

The AP-42 natural gas combustion emission factor for particulate matter (PM) is 0.00186 lb/MMBtu (1.9 lb/MMCF / 1020 MMBtu/MMCF), which is less than the 326 IAC 6-2 particulate emission limit Boilers CB-1 and CB-2. Therefore, Boilers CB-1 and CB-2 is able to comply with the applicable 326 6-2 limit.

- (b) The natural gas-fired combustion units listed below are subject to the requirements of 326 IAC 6-2-4 because each unit began operation after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the following indirect heating units shall be limited to the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and  
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For a total source maximum operating capacity rating (Q) less than 10 MMBtu/hr, particulate emissions (Pt) shall not exceed 0.6 pound per MMBtu of heat input. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1 pound per MMBtu of heat input.

Type of Unit	Maximum Heat Input Capacity (MMBtu/hr)	Q	Pt	Construction Date
Boiler H1	1.25	$10.47 + 1.25 = 11.72$	0.57	2006

The AP-42 natural gas combustion emission factor for particulate matter (PM) is 0.00186 lb/MMBtu (1.9 lb/MMCF / 1020 MMBtu/MMCF), which is less than the 326 IAC 6-2 particulate emission limit for Boiler H1. Therefore, Boiler H1 is able to comply with the applicable 326 6-2 limit.

- (c) The eight (8) space heaters (R1 through R5 and C1 through C3) and the two (2) Maxon oven packs, which were all constructed after September 21, 1983, are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are direct fired heaters and not indirect fired heaters.

Cold Cleaning Degreasing Operation

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) Other systems demonstrated equivalent control such as a refrigerated chiller or carbon absorption. Such systems shall be submitted to the U. S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Maintenance and Grinding

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

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

### **Compliance Determination and Monitoring Requirements**

There is no compliance determination and monitoring requirements applicable to this source.

### **Recommendation**

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 20, 2011.

### **Conclusion**

The operation of this stationary specialty paper manufacturing operation shall be subject to the conditions of the attached MSOP Renewal No. M137-30462-00022.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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](http://www.idem.in.gov)

**Appendix A: Emission Summary**

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

**Uncontrolled Emissions**

Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	CO <sub>2e</sub>	Total HAPs	Worst Case Single HAP
Coating Application	0.00	0.00	0.00	0.00	0.00	68.66	0.00	0.00	0.00	0.00
Adhesive Application	0.00	0.00	0.00	0.00	0.00	11.86	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.19	0.75	0.75	0.06	9.92	0.55	8.34	11981	0.19	0.18 Hexane
Degreasing Operation	0.00	0.00	0.00	0.00	0.00	6.83E-02	0.00	0.00	0.00	0.00
Grinding Operation	0.19	0.19	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	0.38	0.94	0.94	0.06	9.92	81.14	8.34	11981	0.19	0.18 Hexane

**Controlled Emissions**

Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	CO <sub>2e</sub>	Total HAPs	Worst Case Single HAP
Coating Application	0.00	0.00	0.00	0.00	0.00	68.66	0.00	0.00	0.00	0.00
Adhesive Application	0.00	0.00	0.00	0.00	0.00	11.86	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.19	0.75	0.75	0.06	9.92	0.55	8.34	11981	0.19	0.18 Hexane
Degreasing Operation	0.00	0.00	0.00	0.00	0.00	6.83E-02	0.00	0.00	0.00	0.00
Grinding Operation	1.85E-02	1.85E-02	1.85E-02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	0.21	0.77	0.77	0.06	9.92	81.14	8.34	11981	0.19	0.18 Hexane

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

**Company Name: Hazen Paper Company  
Source Address: 604 Railroad Ave, Osgood, Indiana 47037  
Permit No: M137-30462-00022  
Reviewer: Marcia Earl  
Date: April 2011**

Emission Unit	Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Laminator (L6)	Confidential Coating	8.17	61.0%	57.1%	3.90%	55.9%	38.80%	0.41000	120.0	0.72	0.32	15.7	376	68.66	0.00	0.82	100%

**State Potential Emissions**

**Totals      15.7      376      68.66      0.00**

\*Transfer efficiency assumed to be 100%. All materials are applied through roll coating in the Laminator (L6).

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* (Weight % VOC) / (1 - Volume % Water))

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

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

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

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

PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) \* Usage Rate (gal/unit) \* Density (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* (Weight % VOC) / (Volume % Non-Volatiles (solids)))

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

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Emission Unit	Material	Density (lbs/gal)	Weight % VOC	Volume % Water	Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Laminator (L6)	Confidential Adhesive	8.80	0.5%	61.0%	0.57	120	0.10	0.04	2.71	65.0	11.86

There are no particulate emissions from adhesive application. Adhesive is applied through roll coating in the Laminator (L6).

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* (Weight % VOC) / (1 - Volume % Water)

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

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

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

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

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

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
23.11	1020	198.47

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.60	100 **see below	5.50	84
Potential Emission in tons/yr	0.19	0.75	0.75	0.06	9.92	0.55	8.34

\*PM emission factor is filterable PM only. PM10/PM2.5 emission factors are filterable and condensable 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

Description	Emission Unit ID	Heat Input Capacity (MMBtu/hour)
Natural Gas Boiler	CB-1	6.28
Natural Gas Boiler	CB-2	4.19
Natural Gas Boiler	H1	1.25
Natural Gas Fired Space Heater	R1	0.20
Natural Gas Fired Space Heater	R2	0.20
Natural Gas Fired Space Heater	R3	0.20
Natural Gas Fired Space Heater	R4	0.20
Natural Gas Fired Space Heater	R5	0.20
Natural Gas Fired Space Heater	C1	0.90
Natural Gas Fired Space Heater	C2	1.30
Natural Gas Fired Space Heater	C3	1.30
Laminator Dryer	L6D1	3.45
Laminator Dryer	L6D2	3.45
<b>TOTAL MMBtu/hr</b>		<b>23.11</b>

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

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
23.11	1020	198.47

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	2.08E-04	2.08E-04	7.44E-03	0.18	3.37E-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	4.96E-05	1.09E-04	1.39E-04	3.77E-05	2.08E-04

**Potential to emit Total HAPs = 0.19 tons/year**

**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

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

**Company Name:** Hazen Paper Company  
**Address City IN Zip:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit Number:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu ----- mmscf	Potential Throughput MMCF/yr
23.11	1020	198.47

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	11908.45	0.23	0.22
Summed Potential Emissions in tons/yr	11908.89		
CO2e Total in tons/yr	11980.92		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission\ Factor (lb/MMCF) / 2,000\ lb/ton$   
 $CO2e (tons/yr) = CO2\ Potential\ Emission\ ton/yr \times CO2\ GWP (1) + CH4\ Potential\ Emission\ ton/yr \times CH4\ GWP (21) + N2O\ Potential\ Emission\ ton/yr \times N2O\ GWP (310).$

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

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Material*	Maximum Usage (gal/day)	Density (lb/gal)	Maximum Usage (tons/yr)	Volatile Component (%)	PTE of VOC (tons/yr)	Total HAP Component (%)	PTE Total HAP (tons/yr)
Mineral Spirits	0.0550	6.80	6.83E-02	100.0%	6.83E-02	0.0%	0.00

**METHODOLOGY**

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

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

**Appendix A: Emission Calculations  
Grinding Operations**

**Company Name:** Hazen Paper Company  
**Source Address:** 604 Railroad Ave, Osgood, Indiana 47037  
**Permit No:** M137-30462-00022  
**Reviewer:** Marcia Earl  
**Date:** April 2011

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

Control Efficiency (%)**	95.00%
Capture Efficiency (%)**	95.00%
Overall Control Efficiency (%)**	90.25%

Baghouse ID	Pollutant	Number of Filters	Dust Collected* (lbs/grind/filter)	No. of Grinds Per Year* (grinds/year)	Amount of Dust Collected	Uncontrolled Potential to Emit***		Controlled Potential to Emit****	
					(lbs/year)	(lbs/year)	(tons/year)	(lbs/year)	(tons/year)
DC-1	PM/PM10/PM2.5	3	1.10	104	343.20	380.28	0.19	37.1	1.85E-02

\*The dust collected (lbs/grind/filter) was calculated by information from test grinds at the Massachussets Hazen Paper facility, where a dry filter was weighed before and after the grind. The number of grinds per year is based on 8760 hours per year.

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

\*\*\*Uncontrolled Potential to Emit includes uncaptured dust, dust collected on filter, and dust that breaks through filter.

\*\*\*\*Controlled Potential to Emit includes uncaptured dust and dust that breaks through filter.

**Methodology**

Overall Control Efficiency (%) = [Control Efficiency (%)] \* [Capture Efficiency (%)]

Amount of Dust Collected (lbs/yr) = [Number of Filters] \* [Dust Collected (lbs/grind/filter)] \* [Number of Grinds per Year (grinds/year)]

Uncontrolled Potential to Emit (lbs/yr) = [Amount of Dust Collected (lbs/yr)] / [Overall Control Efficiency (%)]

Uncontrolled Potential to Emit (tons/yr) = [Uncontrolled Potential to Emit (lbs/year)] \* [ton/2000 lbs]

Controlled Potential to Emit (lbs/yr) = [Uncontrolled Potential to Emit (lbs/yr)] \* [1 - Overall Control Efficiency (%)]

Controlled Potential to Emit (tons/yr) = [Controlled Potential to Emit (lbs/year)] \* [ton/2000 lbs]



# 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](http://www.idem.IN.gov)

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

**TO:** George Hagan  
Hazen Paper Company  
P.O. Box 135  
Osgood, IN 47037

**DATE:** September 9, 2011

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

**SUBJECT:** Final Decision  
MSOP  
137-30462-00022

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:  
Timothy McDonald (VP – Tech Services)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 9, 2011

TO: Osgood Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Hazen Paper Company**  
**Permit Number: 137-30462-00022**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 9/9/2011 Hazen Paper Company 137-30462-00022 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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1		George Hagan Hazen Paper Company PO Box 135 Osgood IN 47037 (Source CAATS) via confirm delivery										
2		Timothy R McDonald VP - Tech Svcs Hazen Paper Company PO Box 189 Holyoke MA 01040 (RO CAATS)										
3		Ripley County Commissioners 115 North Main Street Rm 130 Versailles IN 47042 (Local Official)										
4		Ripley County Health Department 102 W 1st Street, Ste 106, P.O. Box 423 Versailles IN 47042-0423 (Health Department)										
5		Osgood Public Library 136 W Ripley Osgood IN 47037-1929 (Library)										
6		Osgood Town Council 147 West Ripley Street Osgood IN 47037 (Local Official)										
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