



# 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: December 6, 2012

RE: International Paper / 003-32339-00347

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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## New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**International Paper  
3904 Ferguson Rd  
Fort Wayne, Indiana 46809**

(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.: M003-32339-00347	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 6, 2012  Expiration Date: December 6, 2017

## TABLE OF CONTENTS

A. SOURCE SUMMARY .....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS.....	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12 Permit Renewal [326 IAC 2-6.1-7]	
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14 Source Modification Requirement	
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]	
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17 Annual Fee Payment [326 IAC 2-1.1-7]	
B.18 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS .....	11
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
<b>Corrective Actions and Response Steps</b>	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.14 Malfunctions Report [326 IAC 1-6-2]	
C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1. EMISSIONS UNIT OPERATION CONDITIONS .....	17
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.1.1 Particulate [326 IAC 6-2]	
D.2. EMISSIONS UNIT OPERATION CONDITIONS .....	18
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	
D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]	
D.3. EMISSIONS UNIT OPERATION CONDITIONS .....	19
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]	
<b>Compliance Determination Requirements</b>	
D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]</b>	
D.3.3 Record Keeping Requirements	
D.3.4 Reporting Requirements	
D.4. EMISSIONS UNIT OPERATION CONDITIONS .....	21
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]	
Annual Notification .....	23
Quarterly Report Form .....	24
Malfunction Report .....	25

## 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 corrugated box manufacturing plant.

Source Address:	3904 Ferguson Rd, Fort Wayne, Indiana 46809
General Source Phone Number:	260-747-9111
SIC Code:	2653 (Corrugated and Solid Fiber Boxes)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset 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 source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas-fired boiler, identified as Unit 1, manufactured October 29, 1979 and installed in 2003, with a maximum heat input capacity of 20.922 MMBtu per hour.
- (b) One (1) corrugator, identified as Unit 2, with a maximum potential line speed of 1,000 feet per minute, an equipment blank size of 98 inches, and a maximum throughput capacity of 490 thousand square feet per hour (MSF/hr). Vacuum air from the slitter is connected to dust collector DC-01 exhausting back into the facility.
- (c) One (1) waste paper handling system, identified as Unit 3, with particulate emissions controlled by an integral cyclone having a flow rate of 29,300 cubic feet per minute and an outlet grain loading of 0.00815 grains per cubic foot, with a maximum throughput capacity of 109 thousand square feet per hour (MSF/hr).
- (d) One (1) finishing department, identified as Unit 4, consisting of the following units:
  - (1) One (1) two-color Ward diecutter, identified as unit 2425, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 100 MSF/hr.
  - (2) One (1) two-color Ward diecutter, identified as unit 2434, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.
  - (3) One (1) four-color EVOL flexographic printing folder gluer, identified as unit 5157, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.
  - (4) One (1) two-color Ward flexographic printing folder gluer, identified as unit 5166, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 130 MSF/hr.

- (5) One (1) two-color S&S flexographic printing folder gluer, identified as unit 5186, constructed in 2002, with a maximum throughput capacity of 70 MSF/hr.
- (e) One (1) starch silo, identified as Unit 5, with a maximum throughput capacity of 1,368 pounds of starch per hour.
- (f) One (1) five-gallon parts washing tank with lid in the Maintenance Department used for degreasing processes.

## **SECTION B GENERAL CONDITIONS**

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

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

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

- 
- (a) This permit, M003-32339-00347, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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) If required by specific condition(s) in Section D of this permit, 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.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.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 M003-32339-00347 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 Requirement**

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

**B.15 Inspection and Entry**

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[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, utilize 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 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.8 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

#### **C.11 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.12 Response to Excursions or Exceedances**

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Upon detecting an excursion where a response step 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.13 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.14 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.15 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.16 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) natural gas-fired boiler, identified as Unit 1, manufactured October 29, 1979 and installed in 2003, with a maximum heat input capacity of 20.922 MMBtu per hour.

(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 Particulate [326 IAC 6-2]**

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Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from the natural gas-fired boiler, identified as Unit 1, shall not exceed 0.494 pound per MMBtu heat input.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (c) One (1) waste paper handling system, identified as Unit 3, with particulate emissions controlled by an integral cyclone having a flow rate of 29,300 cubic feet per minute and an outlet grain loading of 0.00815 grains per cubic foot, with a maximum throughput capacity of 109 thousand square feet per hour (MSF/hr).

(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 for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the waste paper handling system shall be less than 2.58 pounds per hour when operating at a process weight rate of 0.5 tons per hour.

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

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

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

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

The integral cyclone shall be in operation at all times the waste paper handling system is in operation.

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

A Preventive Maintenance Plan is required for the waste paper handling system and its control device. Section B - Preventive Maintenance Plan contains the source's obligation with regard to the preventive maintenance plan required by this condition.

### SECTION D.3

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (d) One (1) finishing department, identified as Unit 4, consisting of the following units:
- (1) One (1) two-color Ward diecutter, identified as unit 2425, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 100 MSF/hr.
  - (2) One (1) two-color Ward diecutter, identified as unit 2434, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.
  - (3) One (1) four-color EVOL flexographic printing folder gluer, identified as unit 5157, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.
  - (4) One (1) two-color Ward flexographic printing folder gluer, identified as unit 5166, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 130 MSF/hr.
  - (5) One (1) two-color S&S flexographic printing folder gluer, identified as unit 5186, constructed in 2002, with a maximum throughput capacity of 70 MSF/hr.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

In order to render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable, the input of VOC including ink, adhesives, additives, dilution solvents and cleaning solvents, to the finishing department (Unit 4), shall be less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC emissions from the finishing department (Unit 4) to less than 25 tons per year and shall render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable.

#### Compliance Determination Requirements

##### D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

##### D.3.3 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.3.1.

- (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 solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC input for each month; and
  - (5) The total VOC input for each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.3.4 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

## SECTION D.4

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) One (1) five-gallon parts washing tank with lid in the Maintenance Department used for degreasing processes.

(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.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for the parts washing tank, the owner or operator shall:

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

#### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following control equipment requirements are met for the parts washing tank:

- (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 326 IAC 8-3-5(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 is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following operating requirements are met for the parts washing tank:
- (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>	International Paper
<b>Address:</b>	3904 Ferguson Rd
<b>City:</b>	Fort Wayne, Indiana 46809
<b>Phone #:</b>	260-747-9111
<b>MSOP #:</b>	M003-32339-00347

I hereby certify that International Paper is :

still in operation.

no longer in operation.

I hereby certify that International Paper is :

in compliance with the requirements of MSOP M003-32339-00347.

not in compliance with the requirements of MSOP M003-32339-00347.

<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>

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

**MSOP Quarterly Report**

Source Name: International Paper  
Source Address: 3904 Ferguson Road, Fort Wayne, Indiana 46809  
MSOP Permit No.: M003-32339-00347  
Facility: Finishing Department  
Parameter: Total Combined VOC Input  
Limit: In order to render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable, the input of VOC including ink, adhesives, additives, dilution solvents and cleaning solvents, to the the finishing department (Unit 4), shall be less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

### 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 New Source Review  
and Minor Source Operating Permit (MSOP)

**Source Description and Location**

**Source Name:** International Paper  
**Source Location:** 3904 Ferguson Rd, Fort Wayne, IN 46809  
**County:** Allen  
**SIC Code:** 2653 (Corrugated and Solid Fiber Boxes)  
**Operation Permit No.:** M003-32339-00347  
**Reviewer:** Susann Brown

On September 24, 2012, the Office of Air Quality (OAQ) received an application from International Paper related to the construction and operation of new emission units and the continued operation of an existing stationary corrugated box manufacturing plant.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. R003-23716-00347, issued on April 9, 2007.
- (b) Registration Notice Only Change, issued on July 6, 2012.

Due to this application, the source is transitioning from a Registration to a MSOP with New Source Review.

Note: This source was previously owned and operated by Wabash Fiber Box Company. International Paper Company purchased Wabash Fiber Box Company in April 1998.

**County Attainment Status**

The source is located in Allen County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, 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 PM2.5.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when

evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Allen 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. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

### **Background and Description of Permitted Emission Units**

The Office of Air Quality (OAQ) has reviewed an application, submitted by International Paper on September 24, 2012, related to the construction and operation of new emission units and the continued operation of an existing stationary corrugated box manufacturing plant.

The source consists of the following existing permitted emission units:

- (a) One (1) natural gas-fired boiler, identified as Unit 1, manufactured October 29, 1979 and installed in 2003, with a maximum heat input capacity of 20.922 MMBtu per hour.
- (b) One (1) corrugator, identified as Unit 2, with a maximum potential line speed of 1,000 feet per minute, an equipment blank size of 98 inches, and a maximum throughput capacity of 490 thousand square feet per hour (MSF/hr). Vacuum air from the slitter is connected to dust collector DC-01 exhausting back into the facility.
- (c) One (1) waste paper handling system, identified as Unit 3, with particulate emissions controlled by an integral cyclone having a flow rate of 29,300 cubic feet per minute and an outlet grain loading of 0.00815 grains per cubic foot, with a maximum throughput capacity of 109 thousand square feet per hour (MSF/hr).
- (e) One (1) starch silo, identified as Unit 5, with a maximum throughput capacity of 1,368 pounds of starch per hour.
- (f) One (1) five-gallon parts washing tank with lid in the Maintenance Department used for degreasing processes.

The source has applied to change the identification numbers of the following existing permitted emission units:

- (a) One (1) finishing department, identified as Unit 4, consisting of the following units:

- (1) One (1) diecutter, identified as unit 1311, now identified as Unit 2425, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.
- (2) One (1) flexographic/RSC (regular slotted container) printing press, identified as unit 1461, now identified as Unit 5166, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.
- (3) One (1) flexographic/RSC (regular slotted container) printing press, identified as unit 1441, now identified as Unit 5186, constructed in 2002, with a maximum throughput capacity of 70 MSF/hr.

The source has applied to install the following new equipment as part of the finishing department (Unit 4):

- (a) One (1) two-color Ward diecutter, identified as Unit 2434, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.
- (b) One (1) four-color EVOL flexographic printing folder gluer, identified as unit 5157, approved for construction in 2012, with a maximum throughput capacity of 532 MSF/hr.

The source has applied to remove the following equipment from the source:

- (a) One (1) diecutter, identified as unit 1301, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.
- (b) One (1) diecutter, identified as unit 1302, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.
- (c) One (1) flexographic/RSC (regular slotted container) printing press, identified as unit 1421, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.
- (d) One (1) flexographic/RSC (regular slotted container) printing press, identified as unit 1431, constructed after November 1, 1980 and prior to July 1, 1990, with a maximum throughput capacity of 70 MSF/hr.

As a result of the equipment changes, the emission levels have increased to Minor Source Operating Permit (MSOP) thresholds. Therefore, this source is transitioning from a Registration to an MSOP with New Source Review.

<b>“Integral Part of the Process” Determination</b>
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The Permittee submitted the following information as part of the application for Registration No. 003-23716-00347 to justify why the cyclone should be considered an integral part of the waste paper handling process:

- (a) The cyclone used in conjunction with the waste paper handling process is used to collect large pieces of scrap paper from process machinery. The source collects the large pieces of scrap paper to recycle for a profit. If the large scraps are not removed quickly from the machines, the machines will not be able to operate. The plant would not be able to operate without the cyclone.
- (b) The cost to install a new cyclone system identical to the one used at this source is \$640,000. The annualized cost is \$64,000 per year for an expected lifespan of 10 years. This is a conservative estimate, because the cyclone system is expected to last longer than 10 years without needing to be replaced. The estimated monthly maintenance cost of

the cyclone system is \$1,000. The total monthly cost of the cyclone system and maintenance is estimated at \$6,333. International Paper sells the large pieces of scrap paper collected by the cyclone for an average of \$56,000 per month. Therefore, there is an overwhelming economic advantage to use the cyclone in conjunction with the waste paper handling system.

Pursuant to the TSD for Registration No. 003-23716-00347, IDEM, OAQ evaluated the information submitted and agreed that the cyclone should be considered an integral part of the waste paper handling process. Therefore, the permitting level is determined using the potential to emit after the cyclone. Operating conditions in the proposed permit specify that this cyclone shall operate at all times when the waste paper handling process is in operation.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

This table reflects the unlimited potential emissions of the source after integral waste paper handling system controls.

Pollutant	Potential to Emit (tons/year)
PM	8.28
PM <sub>10</sub> *	1.59
PM <sub>2.5</sub>	1.59
SO <sub>2</sub>	0.05
NO <sub>x</sub>	8.98
VOC	29.16
CO	7.55
GHGs as CO <sub>2</sub> e	10,847
Worst Single HAP	5.38 (Styrene)
Total HAPs	9.71

\* 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".

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 100 tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less 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.
- (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, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

**PTE of the Entire Source After Issuance of the MSOP**

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	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Boiler (Unit 1)	0.17	0.68	0.68	0.05	8.98	0.49	7.55	10,847	0.17	0.16
Corrugator (Unit 2)	7.20	—	—	—	—	0.15	—	—	0.22	0.004
Waste Paper Handling (Unit 3)*	0.49	0.49	0.49	—	—	—	—	—	—	—
Finishing Department (Unit 4)	—	—	—	—	—	< 25.00	—	—	<9.32	<5.38
Starch Silo (Unit 5)	0.42	0.42	0.42	—	—	—	—	—	—	—
<b>Total PTE of Entire Source</b>	<b>8.28</b>	<b>1.59</b>	<b>1.59</b>	<b>0.05</b>	<b>8.98</b>	<b>&lt; 25.64</b>	<b>7.55</b>	<b>10,847</b>	<b>&lt;9.71</b>	<b>&lt;5.54</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
*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 GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

In order to render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable, the input of VOC including ink, adhesives, additives, dilution solvents and cleaning solvents, to the finishing department (Unit 4), shall be less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Compliance with this limit shall limit VOC emissions from the finishing department (Unit 4) to less than 25 tons per year and shall render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable.

**Federal Rule Applicability Determination**

**New Source Performance Standards (NSPS)**

- (a) The requirements of 40 CFR 60, Subpart D (New Source Performance Standards for Fossil-Fuel-Fired Steam Generators for Which Construction Commenced After August 17, 1971) are not included in the permit, because the boiler (manufactured on October 29, 1979) has a maximum heat input rate that is less than 250 million Btu per hour.
- (b) The requirements of 40 CFR 60, Subpart Db (New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit, because the

boiler has a maximum heat input rate that is less than 100 million Btu per hour was manufactured on October 29, 1979, before the June 19, 1984 applicability date for this rule.

- (c) The requirements of 40 CFR 60, Subpart Dc (New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit, since the natural gas-fired boiler (Unit 1) was manufactured on October 29, 1979, before the June 9, 1989 applicability date for this rule. Maintenance was performed on this boiler in 2002 before it was installed at this source in 2003; however, the cost of the maintenance did not exceed 50 percent of the cost to construct a comparable new boiler. Therefore, the maintenance is not considered to be a modification or reconstruction as defined in 40 CFR 60.2 and 60.15.
- (d) The requirements of the New Source Performance Standard (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in the permit, since the printing presses at this source are not rotogravure printing presses.
- (e) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (60.740 to 60.748) (326 IAC 12), are not included in this permit, because the source does not perform polymeric coating of supporting substrates, defined as web coating process that apply elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil (40 CFR 60.741).
- (f) 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)

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Halogenated Solvent Cleaning, (40 CFR 63, Subpart T) (326 IAC 20-6), are not included in the permit because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (h) 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.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, (40 CFR 63, Subpart JJJJ) (326 IAC 20-65), are not included in the permit for the flexographic presses (Units 5157, 5166, 5186), which are not considered web coating lines as defined by 40 CFR 63.3310, because this source is not a major source of hazardous air pollutants (HAPs).
- (j) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95) are not included in the permit renewal, 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 63.11193, Subpart JJJJJJ, are not included in the permit, since the boiler is a gas-fired boiler, as defined in 40 CFR 63.11237, and as such, is specifically listed as not being subject to Subpart JJJJJJ under 40 CFR 63.11195(e).
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (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 Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration, PSD)  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (h) 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.
- (i) 326 IAC 6.8 PM Limitations for Lake County  
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

<b>State Rule Applicability – Individual Facilities</b>
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Natural gas-fired boiler (Unit 1)

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The boiler identified as Unit 1 is subject to 326 IAC 6-2-3 because it was manufactured before September 21, 1983 and is an indirect heating unit. Pursuant to 326 IAC 6-2-4(a), particulate emissions from this boiler should be calculated using the following equation since it was installed at this source after September 21, 1983:

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

Where:

$P_t$  = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).  
 $Q$  = total source operating capacity (1 boiler with a heat input of 20.922 MMBtu/hour)

$$P_t = \frac{1.09}{(20.922)^{0.26}} = 0.494 \text{ lb/MMBtu}$$

Therefore, the boiler has a PM limit of 0.494 lb 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 6-2-4 particulate emission limit of 0.494 MMBtu/hr for the boiler (Unit 1). Therefore, the boiler (Unit 1) is able to comply with the applicable 326 IAC 6-2-4 particulate emission limit without the use of a control device when burning natural gas.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired boiler is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

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

The natural gas-fired boiler is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

Corrugator (Unit 2)

326 IAC 8-1-6 (New Facilities General Reduction Requirements)

The corrugator does not have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the corrugator is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-2 (Surface Coating Emission Limitations)

The corrugator was constructed after November 1, 1980 and prior to July 1, 1990 in Allen County and does not have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the corrugator is not subject to the requirements of 326 IAC 8-2.

### Waste paper handling system (Unit 3)

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the waste paper handling system shall be less than 2.58 pounds per hour when operating at a process weight rate of 0.5 tons per hour.

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

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

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

The integral cyclone shall be in operation at all times the waste paper handling system is in operation.

### Finishing department (Unit 4)

#### 326 IAC 8-1-6 (New Facilities General Reduction Requirements)

None of the facilities in the finishing department have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the emission units in the finishing department are not subject to the requirements of 326 IAC 8-1-6.

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

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-5(a) (Paper Coating Operations), this rule applies to facilities constructed after January 1, 1980, located in any county, with the potential to emit 25 tons per year or more and facilities constructed after July 1, 1990, located in any county, and with the potential to emit greater than fifteen (15) pounds of VOC per day before add-on controls, where each facility is considered a web coating process or saturation process of paper, plastic, metal foil, and/or pressure sensitive tapes and labels regardless of substrate and is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

- (a) One (1) two-color Ward diecutter, identified as Unit 2434, one (1) two-color Ward diecutter, identified as Unit 2425, one (1) four-color EVOL flexographic printing folder gluer, identified as unit 5157, one (1) two-color Ward flexographic printing folder gluer, identified as unit 5166, and one (1) two-color S&S flexographic printing folder gluer, identified as unit 5186 are each not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations), since they are not web coating process or saturation process presses.

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

Pursuant to 326 IAC 8-5-1 (Applicability) and 326 IAC 8-5-5(a) (Graphic Arts Operations), this rule applies to sources (that include packaging rotogravure, publishing rotogravure, or flexographic printing operations), construction of which commences after November 1, 1980, located anywhere in the state, whose source-wide potential VOC emissions are 25 tons per year or more. The Permittee has chosen to limit VOC input to the finishing department (Unit 4) to less than 25 tons per year in order to render the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) not applicable.

#### 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)

This source is not subject to 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing), because this source is not located in Lake or Porter County. This source is located in Allen County.

Starch silo (Unit 5)

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

The starch silo has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-1(b)(14); the starch silo is exempt from the requirements of 326 IAC 6-3.

Parts Washing Tank

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

The parts washing tank is subject to 326 IAC 8-3-2. This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for the parts washing tank, the owner or operator shall:

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

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

Pursuant to 326 IAC 8-3-1(b), the parts washing tank is subject to the requirements of 326 IAC 8-3-5, since it was constructed after the July 1, 1990 applicability date and it does not have a remote solvent reservoir (i.e., it has an open solvent sump exposed to air). Pursuant 326 IAC 8-3-5(a), the owner or operator shall ensure that the following control equipment requirements are met for the parts washing tank:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following control equipment requirements are met for the parts washing tank:
  - (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 326 IAC 8-3-5(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 is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3 (Organic Solvent Degreasing Operations), the parts washing tank is subject to the requirements of 326 IAC 8-3-5, since it was constructed after the July 1, 1990 applicability date and it does not have a remote solvent reservoir (i.e., it has an open solvent sump exposed to air). Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following operating requirements are met for the parts washing tank:
- (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.

#### **Compliance Determination, Monitoring and Testing Requirements**

- (a) There are no compliance monitoring or compliance determination requirements applicable to this source.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 24, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. M003-32339-00347. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department of 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) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Emissions Summary**

**Company Name:** International Paper  
**Source Address:** 3904 Ferguson Rd, Fort Wayne, IN 46809  
**Permit No.:** M003-32339-00347  
**Reviewer:** Susann Brown

**Unlimited Potential to Emit (PTE) Before Integral Cyclone Control (Waste Paper Handling Unit)**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single Highest HAP (Styrene)	
Boiler (Unit 1)	0.17	0.68	0.68	0.05	8.98	0.49	7.55	10,847	0.17	0.16	Hexane
Corrugator (Unit 2)	7.20	—	—	—	—	0.15	—	—	0.22	0.004	Styrene
Waste Paper Handling (Unit 3)*	48.92	48.92	48.92	—	—	—	—	—	—	—	—
Finishing Department (Unit 4)	—	—	—	—	—	28.51	—	—	9.32	5.38	Styrene
Starch Silo (Unit 5)	0.42	0.42	0.42	—	—	—	—	—	—	—	—
<b>Total</b>	<b>56.71</b>	<b>50.02</b>	<b>50.02</b>	<b>0.05</b>	<b>8.98</b>	<b>29.16</b>	<b>7.55</b>	<b>10,847</b>	<b>9.71</b>	<b>5.38</b>	<b>Styrene</b>

**Potential to Emit (PTE) After Integral Cyclone Control (Waste Paper Handling Unit)**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single Highest HAP (Styrene)	
Boiler (Unit 1)	0.17	0.68	0.68	0.05	8.98	0.49	7.55	10,847	0.17	0.16	Hexane
Corrugator (Unit 2)	7.20	—	—	—	—	0.15	—	—	0.22	0.004	Styrene
Waste Paper Handling (Unit 3)*	0.49	0.49	0.49	—	—	—	—	—	—	—	—
Finishing Department (Unit 4)	—	—	—	—	—	28.51	—	—	9.32	5.38	Styrene
Starch Silo (Unit 5)	0.42	0.42	0.42	—	—	—	—	—	—	—	—
<b>Total</b>	<b>8.28</b>	<b>1.59</b>	<b>1.59</b>	<b>0.05</b>	<b>8.98</b>	<b>29.16</b>	<b>7.55</b>	<b>10,847</b>	<b>9.71</b>	<b>5.38</b>	<b>Styrene</b>

**Limited Potential to Emit (PTE) (Finishing Department VOC Limit)**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single Highest HAP (Styrene)	
Boiler (Unit 1)	0.17	0.68	0.68	0.05	8.98	0.49	7.55	10,847	0.17	0.16	Hexane
Corrugator (Unit 2)	7.20	—	—	—	—	0.15	—	—	0.22	0.004	Styrene
Waste Paper Handling (Unit 3)*	0.49	0.49	0.49	—	—	—	—	—	—	—	—
Finishing Department (Unit 4)	—	—	—	—	—	less than 25.00	—	—	less than 9.32	less than 5.38	Styrene
Starch Silo (Unit 5)	0.42	0.42	0.42	—	—	—	—	—	—	—	—
<b>Total</b>	<b>8.28</b>	<b>1.59</b>	<b>1.59</b>	<b>0.05</b>	<b>8.98</b>	<b>25.64</b>	<b>7.55</b>	<b>10,847</b>	<b>9.71</b>	<b>5.38</b>	<b>Styrene</b>

\*Potential to Emit for the Waste Paper Handling (Unit 3) is after integral cyclone for purposes of determining permit level.

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

**Company Name:** International Paper  
**Source Address:** 3904 Ferguson Rd, Fort Wayne, IN 46809  
**Permit No.:** M003-32339-00347  
**Reviewer:** Susann Brown

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
20.922	1020	179.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.17	0.68	0.68	0.05	8.98	0.49	7.55

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 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/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPs Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.9E-04	1.1E-04	6.7E-03	1.6E-01	3.1E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	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	4.5E-05	9.9E-05	1.3E-04	3.4E-05	1.9E-04

**Total HAPs: 0.17**

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

**Greenhouse Gas Emissions**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	10,781	0.21	0.20
Summed Potential Emissions in tons/yr	10,781		
CO2e Total in tons/yr	10,847		

**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  
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations  
Corrugator**

**Company Name: International Paper  
Source Address: 3904 Ferguson Rd, Fort Wayne, IN 46809  
Permit No.: M003-32339-00347  
Reviewer: Susann Brown**

<b>Corrugator Capacity</b>		
Equipment size (width)	ft	8.17
Potential Line Speed	ft/min	1,000
	ft/hr	60,000
Potential Production	msf/hr	490
	msf/yr	4,294,152

Product	Pollutant	% wt	Usage (lbs/msf)	Potential Production (msf/yr)	Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
CC Super Tack	VOC	0.10	1.00E-05	4,294,152	42.94	0.02
	Total HAPs	0.04	2.00E-06	4,294,152	8.59	0.004
	Styrene	0.04	2.00E-06	4,294,152	8.59	0.004
NS Resin (Dacrex)	VOC	0.64	6.00E-05	4,294,152	257.65	0.13
	Total HAPs	1.10	1.00E-04	4,294,152	429.42	0.21
	Methanol	1.00	1.00E-04	4,294,152	429.42	0.21
	Formaldehyde	0.10	1.00E-05	4,294,152	42.94	0.02

Maximum Throughput (tons/hr)*	PM Emission Factor (lbs/ton)**	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
26.96	0.061	1.64	7.20

\*1 MSF = 110 lbs

\*\*there is no published emission factor for the removal of dust and cardboard conveyance; therefore, the emission factor for headhouse and grain handling (SCC 3-02-005-30) from AP 42, Chapter 9.9.1, Table 9.9.1-1 was used as an approximate estimate

<b>Summary</b>		
Pollutant	lbs pollutant/yr	tons pollutant/yr
PM	14,406.88	7.20
VOC	300.59	0.15
Total HAPs	438.00	0.22
Styrene	8.59	0.004
Methanol	429.42	0.21
Formaldehyde	42.94	0.02

**Methodology**

Potential Line Speed (ft/hr) = [Potential Line Speed (ft/min)] \* [60 min/hr]

Potential Production (msf/hr) = [Potential Line Speed (ft/hr)] \* [Equipment Size (width) (ft)] \* [msf/1,000 ft<sup>2</sup>]

Potential Production (msf/yr) = [Maximum Potential Production (msf/hr)] \* [8760 hrs/yr]

Potential to Emit (lbs/yr) = [Potential Production (msf/yr)] \* [Usage (lbs/msf)]

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

**Appendix A: Emission Calculations  
Waste Paper Handling**

**Company Name: International Paper  
Source Address: 3904 Ferguson Rd, Fort Wayne, IN 46809  
Permit No.: M003-32339-00347  
Reviewer: Susann Brown**

Maximum Production (msf/yr)	Scrap Weight (tons scrap/msf)	Scrap Production Rate (tons scrap/yr)	Emission Factor (lbs/ton)	Uncontrolled Potential to Emit (PTE)		Control Efficiency*	Controlled Potential to Emit (PTE)**	
				PM/PM10/PM2.5 (lb/yr)	PM/PM10/PM2.5 (ton/yr)		PM/PM10/PM2.5 (lb/yr)	PM/PM10/PM2.5 (ton/yr)
11,948,640	0.0046	54,963.74	1.78	97,835.46	48.92	99.0%	978.35	0.49

**Methodology**

\*Cyclone Control Efficiency = 99%

\*\*Potential to Emit for the Waster Paper Handling (Unit 3) is after integral cyclone for purposes of determining permit level.

Uncontrolled Potential to Emit (PTE) (lb/yr) = [Scrap Production Rate (tons scrap/yr)] \* [Emission Factor (lbs/ton)]

Uncontrolled Potential to Emit (PTE) (ton/yr) = [Uncontrolled Potential to Emit (PTE) (lb/yr)] \* [ton/2000 lb]

Controlled Potential to Emit (PTE) (lb/yr) = [Uncontrolled Potential to Emit (PTE) (lb/yr)] \* [1 - Control Efficiency]

Controlled Potential to Emit (PTE) (ton/yr) = [Uncontrolled Potential to Emit (PTE) (ton/yr)] \* [1 - Control Efficiency]

**Allowable Emissions Under 326 IAC 6-3-2**

Emissions Unit Description	Maximum Throughput (msf/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Waste Paper Handling	109	0.50	1.78	Cyclone	99.0%	0.89	2.58	0.009

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

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

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

**Appendix A: Emission Calculations  
Finishing Department**

**Company Name: International Paper  
Source Address: 3904 Ferguson Rd, Fort Wayne, IN 46809  
Permit No.: M003-32339-00347  
Reviewer: Susann Brown**

Unit	Maximum Capacity (msf/hr)	Maximum Capacity (msf/yr)
Unit 2425	100	876000
Unit 2434	532	4660320
Unit 5157	532	4660320
Unit 5166	130	1138800
Unit 5186	70	613200
<b>Totals</b>	<b>1364</b>	<b>11,948,640</b>

**Ink:**

Potential Production (msf/yr)	Usage (lbs/msf)	Potential Usage (lbs/yr)	% Pollutant		Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
11,948,640	0.3	3584592	VOC	1.57%	56278.09	28.14
			Total HAPs	0.52%	18639.88	9.32
			Styrene	0.30%	10753.78	5.38

**Adhesives:**

Potential Production (msf/yr)	Usage (lbs/msf)	Potential Usage (lbs/yr)	% Pollutant		Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
11,948,640	0.06	716918.4	VOC	0.098%	702.58	0.35

**Additives:**

Potential Production (msf/yr)	Usage (lbs/msf)	Potential Usage (lbs/yr)	% Pollutant		Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
11,948,640	0.001	11948.64	VOC	0.35%	41.82	0.021

Note: The ink, adhesives, and additives usage is allocated proportionately among the five units in the finishing department.

**Summary**

Pollutant	Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
VOC	57022.49	28.51
Total HAPs	18639.88	9.32
Styrene	10753.78	5.38

**Methodology**

Potential Usage (lbs/yr) = [Potential Production (msf/yr)] \* [Usage (lbs/msf)]  
 Potential to Emit (tons/yr) = [Potential Usage (lbs/yr)] \* [% Pollutant]  
 Potential to Emit (tons/yr) = [Potential to Emit (lbs/yr)] \* [ton/2000 lbs]

**Appendix A: Emission Calculations  
Starch Silo**

**Company Name:** International Paper  
**Source Address:** 3904 Ferguson Rd, Fort Wayne, IN 46809  
**Registration No.:** M003-32339-00347  
**Reviewer:** Susann Brown

**Emissions Factor:**

Emission factor is from AP 42, Chapter 9.9.7, Table 9.9.7-1 for starch storage bins

\*\* The AP-42 emission factor is based on control by fabric filter. A control efficiency of 99.0% is assumed for a fabric filter in order to calculate the PTE before controls.

Controlled Emission Factor (lb PM/ton starch)	=	0.0014	lb PM/ton starch unloaded
Uncontrolled Emission Factor (lb PM/ton starch)	=	0.14	lb PM/ton starch unloaded

**Assumptions:**

Delivery Truck Capacity	=	50,000	lbs of starch/delivery
Delivery Duration	=	1.5	hours/delivery
Filter Efficiency	=	98%	
Starch Usage	=	2.79	lbs starch/msf
Maximum deliveries/day	=	1	deliveries/day

**Emissions:**

Maximum Production Rate	=	4,294,152	msf/yr
Starch Usage	=	2.79	lbs starch/msf
Maximum Starch Usage	=	11,980,684	lbs starch/yr
Deliveries/yr	=	239.6	deliveries/yr
starch usage (lbs/yr) / deliveries (lbs/delivery)			

**Uncontrolled Emissions**

EF (lb PM/ton starch) x (lbs starch/delivery) x (ton/2000 lbs)	=	3.5	lbs PM/delivery
Uncontrolled Emissions (lbs PM/delivery) x (deliveries/yr)	=	839	lbs PM/yr
Uncontrolled Emissions (lbs PM/yr) x (ton/2000 lbs)	=	0.42	tons/yr

**Controlled Emissions**

Uncontrolled Emissions (lbs PM/delivery) x (1 - filter efficiency)	=	0.07	lbs PM/delivery
Uncontrolled Emissions (lbs PM/yr) x (1 - filter efficiency)	=	16.8	lbs PM/yr
Controlled Emissions (lbs PM/yr) x (ton/2000)	=	0.008	tons/yr

Assume PM = PM10 = PM2.5



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

**TO:** Scott Goodpaster  
International Paper  
3904 Ferguson Road  
Fort Wayne, IN 46809

**DATE:** December 6, 2012

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

**SUBJECT:** Final Decision  
New source Review & Minor Source Operating Permit  
003-32339-00347

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:  
Ross Carolus – Indiana Complex GM  
Phillip Gregg – Concentra Environmental Health and Safety 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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[www.idem.IN.gov](http://www.idem.IN.gov)

December 6, 2012

TO: Allen County Public Library

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

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

**Applicant Name: International Paper**  
**Permit Number: 003-32339-00347**

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	GHOTOPP 12/6/2012 International Paper 003-32339-00347 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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Scott Goodpaster International Paper 3904 Ferguson Rd Fort Wayne IN 46809 (Source CAATS) via confirmed delivery										
2		Ross Carolus Indiana Complex GM International Paper 3904 Ferguson Rd Fort Wayne IN 46809 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)										
6		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
7		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
8		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
9		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
10		Mr. Phillip Gregg Concentra Environmental Health and Safety Services 10339 Dawsons Creek Blvd., Ste 7E Ft Wayne IN 46825 (Consultant)										
11												
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