



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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January 31, 2013

Mr. Ryon Macey
RockTenn CP, LLC
1000 Pidco Dr.
Plymouth, IN 46563

Re: Permit By Rule Status
099-32585-00050

Dear Mr. Macey

On December 3, 2012, RockTenn CP, LLC submitted a letter with supporting data to the Office of Air Quality (OAQ) indicating that the stationary gravure coating and printing source, located at 1000 Pidco Dr., Plymouth, IN 46563, satisfies the criteria to operate under the provisions of 326 IAC 2-10 (Permit by Rule). Based on the data and information submitted and the provisions of 326 IAC 2-10 (Permit by Rule), RockTenn CP, LLC, is now operating under Permit by Rule (PBR) Status.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone). [326 IAC 2-10-3.1(1)(A)]
 - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs). [326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4.1]
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4.1]

This source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63. [326 IAC 2-10-5.1]

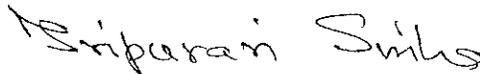
Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4, IC 13-30-5, or IC 13-30-6. [326 IAC 2-10-6.1]

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

If you have any questions on this matter, please contact Bruce Farrar, of my staff, at 317-234-5401 or 1-800-451-6027, and ask for extension 4-5401.

Sincerely,



Tripurari P. Sinha, Ph. D, Section Chief
Permits Branch
Office of Air Quality

TS/fb

cc: File – Marshall County
Marshall County Health Department
Compliance and Enforcement Branch

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

**Technical Support Document (TSD) for a Part 70 Permit Transitioning to
Permit By Rule (PBR)**

Source Description and Location

Source Name:	RockTenn CP, LLC
Source Location:	1000 Pidco Drive, Plymouth, Indiana 46563 1100 Pidco Drive, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	2672 (Coated and Laminated Paper, Not Elsewhere Classified) 2653 (Corrugated and Solid Fiber Boxes)
Permit By Rule No.:	PBR 099-32585-00050
Permit Reviewer:	Bruce Farrar

Source Definition

This operation of a gravure coating and printing company consists of two (2) plants:

- (a) Plant 1 is located at 1000 Pidco Drive, Plymouth, Indiana; and
- (b) Plant 2 is located at 1100 Pidco Drive, Plymouth, Indiana.

However, these plants are located on contiguous properties, have the same SIC codes and are under common control; therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).

Existing Approvals

The source was issued Part 70 Operating Permit No. T099-26207-00050 on March 27, 2009. The source has since received the following approvals:

Administrative Amendment No. T099-26207-00050, issued on December 4, 2012.

County Attainment Status

The source is located in Marshall County.

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

¹Unclassifiable 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Marshall County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} 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_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x 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**
Marshall County has been classified as attainment or unclassifiable in Indiana for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed a Permit by Rule application, submitted by RockTenn CP, LLC on December 3, 2012, relating to the transition from a Part 70 Permit to a Permit by Rule (PBR).

The following is a list of existing emission units and pollution control devices:

Plant 1 1000 Pidco Drive

- (a) One (1) Eclipse model 200 RH-D5 laminator/web-fed roll coater, constructed in 1995, equipped with one (1) 2.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #2, exhausting to Stack S2, capacity: 67,500 square feet per hour.
- (b) One (1) Inta-Roto laminator/web-fed roll coater, constructed in 1994, equipped with one (1) 0.75 million British thermal units per hour natural gas-fired curing oven, identified as Unit #3, exhausting to Stack S3, capacity: 65,000 square feet per hour.
- (c) One (1) Inta-Roto laminator/web-fed roll coater, constructed in 1994, equipped with one (1) 1.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #4, exhausting to Stack S4, capacity: 57,300 square feet per hour.
- (d) Combustion source flame safety purging on startup.

Plant 2 1100 Pidco Drive

- (e) Nine (9) formers, constructed in 2011, each with a capacity of 30,222.22 square feet of paper per hour, exhausting inside.

- (f) One (1) corrugator, constructed in 2011, with a capacity of 240,000 square feet of paper per hour, exhausting inside.

Plant 1 and Plant 2

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour: one (1) air makeup unit, rated at 3.8 million British thermal units per hour.
- (h) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (i) Two (2) scrap collection systems, each consolidating scraps:
 - (1) Plant 1 scrap collection system with a capacity of 2,288.29 pounds of scrap per hour, using an integral cyclone to divert scrap to a compactor.
 - (2) Plant 2 scrap collection system with a capacity of 5,301.56 pounds of scrap per hour, using an integral cyclone to divert scrap to a baler.
- (j) Closed loop heating and cooling systems;
- (k) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs;
- (l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (l) Paved and unpaved roads and parking lots with public access [326 IAC 6-4]; and
- (m) Purge double block and bleed valves.

“Integral Part of the Process” Determination

The applicant has submitted the following information to justify why the cyclone for the Scrap collection system - consolidator, cyclone and baler at the 1000 and 1100 Pidco Drive facilities should be considered an integral part of the process:

The scrap from the laminator/web-fed roll coaters are pneumatically conveyed from the laminator/web-fed roll coaters to trash receptacles or balers. The cyclones separate the scrap from the air stream, when the scrap has reached its destination. The primary function of the pneumatic conveyance systems and the cyclones is to transport the scrap and separate scrap from air when the scrap has reached the trash receptacles or baler. The pneumatic transfer process cannot function without this cyclone without resulting in the scrap being scattered throughout the facility.

Therefore, the primary purpose of the cyclone is not pollution control but, energy transference. The cyclone is use to slow down the scrap (paper, laminated foil, and poly films) from the pneumatic transfer system and allows the scrap to fall into the scrap receptacles.

IDEM, OAQ has evaluated the information submitted and agrees that the cyclone should be considered an integral part of the pneumatic conveyance systems. Therefore, the permitting level will be determined using the potential to emit after the cyclone.

Therefore, the cyclones will be considered integral for the Scrap collection system operation.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Federal Rule Applicability Determination

The following federal rules are applicable to the source:

NSPS:

- (a) The requirements for the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit because boiler 1 has a heat input capacity less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60.440, Subpart RR, are not included in the permit for the three (3) laminators/web-fed roll coaters, identified as Units #2, #3, and #4. The source operations utilizing the laminators/coaters do not manufacture Pressure Sensitive Tape or perform Label Surface Coating.
- (c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

NESHAP:

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (326 IAC 20-18) are not included in the permit for the three (3) laminator/coaters. This source is not a major source of HAPs, as defined in 40 CFR 63.2. The applicant has agreed to limit emissions of the worst case single HAP to less than ten (10) tons per year, and to limit emissions of combined HAPs to less than twenty-five (25) tons per year.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ (326 IAC 20-65) are not included in the permit for the three (3) laminator/web-fed roll coaters. This source is not a major source of HAPs, as defined in 40 CFR 63.2. The applicant has agreed to limit emissions of the worst case single HAP to less than ten (10) tons per year, and to limit emissions of combined HAPs to less than twenty-five (25) tons per year.
- (f) The requirements of National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) are not included in this permit, because this source is not a major source for HAPs.
- (g) The requirements of National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJ) are not included in this permit, because this source uses natural gas-fired boilers and is not subject to the subpart or any requirements of the subpart (40 CFR 63.11195(e)).

- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this source.
- (i) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to this source.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Nonattainment New Source Review)

Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-10 (Permit by Rule)

Pursuant to 326 IAC 2-10 this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone).
[326 IAC 2-10-3.1(1)(A)]
 - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs).
[326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]

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 located in Marshall County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, 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.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units constructed after September 21, 1983 shall be limited using the following equation:

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

where: Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For boiler 1

Q= 4.2

Pursuant to 326 IAC 6-3-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

Based on the AP-42 particulate emission factor for natural gas combustion, the potential to emit particulate emissions from the boiler 1 is 0.06 pounds per million British thermal units. Therefore, the boiler 1 will be able to comply with this rule.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(1), the boiler 1 is exempt from the requirements of 326 IAC 6-3 since it is a source of indirect heating.
- (b) Pursuant to 326 IAC 6-3-1(b)(6), the three (3) laminator/web-fed roll coaters, identified as Units #2, #3 and #4, are exempt from the requirements of 326 IAC 6-3 because the three (3) laminator/web-fed roll coaters apply a surface coating using roll coating.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Scrap collection system	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
Plant 1	2,888.29	5.2
Plant 2	5,301.56	7.88

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

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

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

Based on calculations, the integral cyclones are not needed to comply with these limits.

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

The three (3) laminator/coaters, identified as Units #2, #3 and #4, are subject to the requirements of 326 IAC 8-2-5, since they were each constructed after July 1, 1990, the actual VOC emissions are greater than fifteen (15) pounds per day, and the units saturate 100% of the substrate. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the three (3) laminators/coaters, identified as Units #2, #3 and #4, shall be limited to 2.9 pounds of VOCs per gallon of coating less water.

Based on the MSDS submitted by the source and calculations made, the three (3) laminators/coaters, identified as Units #2, #3 and #4, are able to comply with this requirement.

Compliance Determination and Monitoring Requirements

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone).
 - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs).
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations.
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions.
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required.

Conclusion and Recommendation

The source shall be subject to the conditions of the attached proposed Permit by Rule (PBR). The staff recommend to the Commissioner that this Permit by Rule be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
Limited Emissions - Summary**

**Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012**

Emission Unit	PM	PM₁₀	PM_{2.5}	SOx	NOx	VOC	CO	GHGs as CO₂e
Combustion	0.00	0.01	0.01	0.00	0.11	0.01	0.09	135
Cornstarch Operations	0.00	0.00	0.00	-	-	-	-	-
Scrap collection system - consolidator, cyclone and baler*	0.27	0.27	0.27	-	-	-	-	-
Adhesives	-	-	-	-	-	0.36	-	-
Inks	-	-	-	-	-	0.01	-	-
Coatings	-	-	-	-	-	1.11	-	-
Cleaning	-	-	-	-	-	0.07	-	-
Total	0.27	0.27	0.27	0.00	0.11	1.56	0.09	135.08

HAPs (tons/yr)

Benzene =	2.36E-06	tons/yr
Dichlorobenzene =	0.00E+00	tons/yr
Formaldehyde =	3.27E-03	tons/yr
Hexane =	2.02E-03	tons/yr
Toluene =	3.82E-06	tons/yr
Lead =	5.62E-07	tons/yr
Cadmium =	1.24E-06	tons/yr
Chromium =	1.57E-06	tons/yr
Manganese =	4.27E-07	tons/yr
Nickel =	2.36E-06	tons/yr
Arsenic =	-	tons/yr
Beryllium =	-	tons/yr
Mercury =	-	tons/yr
Selenium =	-	tons/yr
Acetaldehyde=	0.00E+00	tons/yr
Acrylic Acid=	5.87E-05	tons/yr
1,2-eth glycol monobutyl ether=	0.02	tons/yr
2-Butoxyethanol=	0.00E+00	tons/yr
Glycol Ethers*=	0.01	tons/yr
Methanol=	0.03	tons/yr
Methyl Methacrylate=	0.00E+00	tons/yr
Styrene=	1.29E-04	tons/yr
Vinyl Acetate=	0.03	tons/yr
Mixed HAPs=	0.11	tons/yr
Total HAPs=	0.20	tons/yr

**Appendix A: Emission Calculations
Potential to Emit - Summary**

**Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012**

****Potential to Emit Summary****

Criteria Pollutants: Uncontrolled (tons/yr)

Emission Unit	PM	PM₁₀	PM_{2.5}	SOx	NOx	VOC	CO	GHGs as CO_{2e}
Cumbustion	0.06	0.26	0.26	0.02	2.51	0.19	2.87	4105
Cornstarch Operations	0.00	0.00	0.00	-	-	-	-	-
Scrap collection system - consolidator, cyclone and baler*	1.79	1.79	1.79	-	-	-	-	-
Eclipse 200 Unit #2	-	-	-	-	-	5.74	-	-
Inta-Roto Unit #3	-	-	-	-	-	9.25	-	-
Inta-Roto Unit #4	-	-	-	-	-	7.81	-	-
NA	-	-	-	-	-	0.00	-	-
All Formers	-	-	-	-	-	0.00	-	-
Corrugator	-	-	-	-	-	6.68	-	-
Parts Washer	-	-	-	-	-	0.10	-	-
Maintenance Machining	0.0004	0.0004	0.0004	-	-	-	-	-
Maintenance Welding	0.0090	0.0090	0.0090	-	-	-	-	-
Total	1.87	2.06	2.06	0.02	2.51	29.77	2.87	4105

*The cyclone has been determined to be integral to the Recycled Material System; therefore the controlled potential to emit from this emission unit is considered for permit level determination.

** The VOC emissions from these unit are accounted for in the adhesive calculations on the other units.

HAPs (tons/yr)

Benzene =	0.01	tons/yr
Dichlorobenzene =	0.00	tons/yr
Formaldehyde =	0.04	tons/yr
Hexane =	0.06	tons/yr
Toluene =	0.00	tons/yr
Lead =	0.00	tons/yr
Cadmium =	0.00	tons/yr
Chromium =	0.00	tons/yr
Manganese =	0.00	tons/yr
Nickel =	0.00	tons/yr
Arsenic =	-	tons/yr
Beryllium =	-	tons/yr
Mercury =	-	tons/yr
Selenium =	-	tons/yr
Glycol Ethers =	0.00	tons/yr
Diethylene Glycol Monoethyl Ether*=	4.03	tons/yr
Vinyl Acetate =	3.88	tons/yr
Xylene =	0.00	tons/yr
Ethylglycol =	0.00	tons/yr
Acrylic acid=	0.00	tons/yr
Diethanolamine=	0.00	tons/yr
Methanol=	0.06	tons/yr
Styrene	0.09	tons/yr
Total =	8.17	tons/yr

**Appendix A: Emission Calculations
Boiler and Dryers**

Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Boiler 1	4.20	1020	36.07
Dryer Unit 2	2.00	1020	17.18
Dryer Unit 3	0.75	1020	6.44
Dryer Unit 4	1.00	1020	8.59
Totals	7.95		68.28

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	Nox**	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	50 100	5.5	84
Potential Emission in tons/yr	0.06	0.26	0.26	0.020	2.51	0.19	2.87

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.17E-05	4.10E-05	2.56E-03	0.06	1.16E-04	1.71E-05	3.76E-05	4.78E-05	1.30E-05	7.17E-05

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Greenhouse Gases (GHGs)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,128	2.27	0.23
Potential Emission in tons/yr	4,101	0.08	0.01
Summed Potential Emissions in tons/yr	4,101		
CO2e Total in tons/yr	4,105		

Methodology

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) 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).

GHG emission factors calculated from heat value and emission factors in Tables C-1 and C-2 of 40 CFR Part 98 Subpart C

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide

DCB = Dichlorobenzene
Pb = Lead
Cd = Cadmium
Cr = Chromium
Mn = Manganese
Ni = Nickel

CO2 = Carbon Dioxide
CH4 = Methane
N2O = Nitrous Oxide
CO2e = CO2 equivalent emissions

**Appendix A: Emission Calculations
Cornstarch Operations
Recycled Material System**

**Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012**

Cornstarch Operations: Starch Silo & Cornstarch Mixing Tank

Emission Unit	Maximum Throughput (lbs/hr)	PM Emission Factor (lbs/ton)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
Starch Silo		3.14	0.00	0.00
Cornstarch Mixing Tank*	-	-	negligible	negligible
Total				0.00

Facility does not have a starch silo

*Emissions from the Cornstarch Mixing Tank are negligible because this is a wet process that takes place in a completely enclosed system.

Methodology

Maximum Throughput (lbs/hr) = Maximum Corrugator Throughput (650 ft/min * 87 in wide * 1 ft/12 in * 1 msf/1000 ft²) * Maximum starch application (4 # starch/msf)

PM Emissions (lbs/hr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs)

PM Emissions (tons/yr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs) * (8760 hrs/yr) * (1 ton/2000 lbs)

Emission Factor is from US EPA's AP 42, Chapter 11.2, Table 11.12-2: Emission Factors for Concrete Batching, Cement supplement unloading to elevated

Recycled Material System Cyclone

cyclone control efficiency = 95.0%

1100 Pidco

Emission Unit	Maximum Throughput (lbs/hr)	PM Emission Factor (lbs/lbs)	Uncontrolled		Controlled*	
			PM Emissions (lbs/hr)	PM Emissions (tons/yr)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
Scrap collection system - consolidator, cyclone and baler	5301.56	0.001	5.3016	23.221	0.26508	1.16104

1000 Pidco

Emission Unit	Maximum Throughput	PM Emission Factor	PM Emissions	PM Emissions	PM Emissions	PM Emissions
Scrap collection system - consolidator, cyclone and compactor	2888.29	0.001	2.8883	12.651	0.14441	0.63253

Methodology

*The cyclone has been determined to be integral to the Recycled Material System; therefore the controlled potential to emit from this emission unit is considered for permit level determination.

Maximum Throughput (lbs of trim waste/hr) = 0.15 (max percent of production that is scrap) * [Corrugator maximum throughput (1100 Pidco) or laminator maximum throughput (1000 Pidco)].

Uncontrolled PM Emissions (lbs/hr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs)

Uncontrolled PM Emissions (tons/yr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs) * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled PM Emissions (lbs/hr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs) * (1 - control efficiency)

Controlled PM Emissions (tons/yr) = Maximum Throughput (lbs/hr) * PM Emission Factor (lbs/ton) * (1 ton/2000 lbs) * (8760 hrs/yr) * (1 ton/2000 lbs) *

Emission Factor is based on industry standard for percent of trim material that is dust: 0.10% by weight.

**Appendix A: Emission Calculations
VOC
Printing**

**Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012**

Printing Operations

Throughput			
Unit ID	Maximum Line Speed (ft/min)	Maximum Print Width (in)	Max Throughput (MMin ² /yr)
Eclipse 200 Unit #2			18,340
Inta-Roto Unit #3			29,547
Inta-Roto Unit #4			24,963
NA			0
All Formers	800	68	343,112
Corrugator	800	60	302,746

Ratio factor	Machine width
0.251748252	36
0.405594406	58
0.342657343	49

Total 2011 Throughput (MSF/hr) 58
 Max calculated based on 2011 hourly production times 8760 hours.
 Individual unit throughput based on a ratio of the machine width times total throughput.

Max calculated throughput based on max corrugator speed and maximum corrugator width.
 Max calculated throughput based on max corrugator speed and maximum print width.

VOC Emissions

Press ID Printing Material	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off (%)	Throughput (MMin ² /yr)	VOC Emissions (tons/yr)
Eclipse 200 Unit #2					
Coating	8.3	5.604%	100.0%	18,340	4.27
Adhesive	17.3	0.930%	100.0%	18,340	1.48
Ink	0	2.310%	100.0%	18,340	0.00
Inta-Roto Unit #3					
Coating	8.3	5.604%	100.0%	29,547	6.87
Adhesive	17.3	0.930%	100.0%	29,547	2.38
Ink	0	2.310%	100.0%	29,547	0.00
Inta-Roto Unit #4					
Coating	8.3	5.604%	100.0%	24,963	5.81
Adhesive	17.3	0.930%	100.0%	24,963	2.01
Ink	0	2.310%	100.0%	24,963	0.00
NA					
Inks	1.8	0.000%	100.0%	0	0.00
Glues	0.65	0.000%	100.0%	0	0.00
All Formers					
Inks	0	0.000%	100.0%	343,112	0.0000
Glues	0.867	0.002%	100.0%	343,112	0.0031
Corrugator					
Inks	1.8	2.5%	100.0%	302,746	6.68
glue	0	0.000%	100.0%	302,746	0.00

All printing is done inline on the corrugator

All glueing is done on the former units.

Total VOC Emissions (tons/yr) = 29.48

Methodology

Heat set offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100% (Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93)).

Calculations are based on operation at rated capacity for 8760 hrs/year; maximum hourly usage based on 2011 operation data provided by the source; maximum weight VOC and HAPs determined based on weight % VOC of inks used in 2011; maximum plate coverage (lbs/MMin²) based on industry-specific Fiber Box Association numbers; maximum line speed based on the max. speed of the unit

Glycol ethers are included in the HAP calculations, even though US EPA no longer considers glycol ethers to be HAPs, because the manufacturer % content of the glycol ether group of compounds is proprietary and could not be obtained or verified by the source.

Corrugator throughput (MMin²/yr) = Maximum Line Speed (ft/min) * Maximum Print Width (in) * (12 in/ft) * (60 min/hr) * (8760 hr/yr) * (1 MMin²/1,000,000). Former throughput based on full board width of corrugator throughput.

VOC Emissions (tons/yr) = Maximum Coverage (lbs/MMin²) * Weight % Volatiles (Weight % Water & Organics - Weight % Water) * Flash Off (%) * Throughput (MMin²/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP
Printing

Company Name: **RockTenn - Plymouth**
 Address: **1000 - 1100 Pidco Road, Plymouth IN 46563**
 Permit No.: **099-32585-00050**
 Reviewer: **Bruce Farrar**
 Date: **December 3, 2012**

Throughput

Unit ID	Maximum Line Speed (ft/min)	Maximum Print Width (in)	Max Throughput (MMin ² /yr)
Eclipse 200 Unit #2			18,340
Inta-Roto Unit #3			29,547
Inta-Roto Unit #4			24,963
NA			0
All Formers	800	68	343,112
Corrugator	800	60	302,746

Ratio factor	Machine width	Total 2011 Throughput (MSF/hr)	
0.251748252	36	58	Max calculated based on 2011 hourly production times 8760 hours.
0.405594406	58		Individual unit throughput based on a ratio of the machine width times total throughput.
0.342657343	49		

Max calculated throughput based on max corrugator speed and maximum corrugator width.
 Max calculated throughput based on max corrugator speed and maximum print width.

HAP Emissions

Press ID Printing Material	Maximum Coverage (lbs/MMin ²)	Flash Off (%)	Throughput (MMin ² /yr)	Weight % Glycol Ethers	Weight % Ethylene Glycol	Weight % Diethylene Glycol Monoethyl Ether	Weight % Acrylic Acid	Weight % Diethanolamine	Weight % Styrene	Weight % Formaldehyde	Weight % Methanol	Weight % Acetaldehyde	Weight % Vinyl Acetate
Eclipse 200 Unit #2													
Coating	8.3	100.0%	18,340			0.73%			0.030%				
Adhesive	17.3	100.0%	18,340			0.29%							0.33%
Ink	0	100.0%	18,340	0.05%	0.01%		0.007%	0.004%	0.001%				0.08%
NA													
Inta-Roto Unit #3													
Coating	8.3	100.0%	29,547			0.73%			0.030%				
Adhesive	17.3	100.0%	29,547			0.29%							0.33%
Ink	0	100.0%	29,547	0.05%	0.01%		0.007%	0.004%	0.001%				0.08%
NA													
Inta-Roto Unit #4													
Coating	8.3	100.0%	24,963			0.73%			0.030%				
Adhesive	17.3	100.0%	24,963			0.29%							0.33%
Ink	0	100.0%	24,963	0.05%	0.01%		0.007%	0.004%	0.001%				0.08%
NA													
Inks	1.8	100.0%	0										
Glues	0.65	100.0%	0										
All Formers													
Inks	0	100.0%	343,112										
Glues	0.867	100.0%	343,112										
Corrugator													
Inks	1.8	100.0%	302,746							0.012%	0.021%	0.004%	0.660%
glue	0	100.0%	302,746										

Press ID Printing Material	Glycol Ethers Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Diethylene Glycol Monoethyl Ether Emissions (tons/yr)	Acrylic Acid Emissions (tons/yr)	Diethanolamine Emissions (tons/yr)	Styrene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Methanol Emissions (tons/yr)	Benzene Emissions (tons/yr)	Vinyl Acetate Emissions (tons/yr)
Eclipse 200 Unit #2										
Coating	0.00	0.00	0.56	0.00	0.00	0.02	0.00	0.00	0.00	0.00
Adhesive	0.00	0.00	0.46	0.00	0.00	0.00	0.00	0.00	0.00	0.52
Ink	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NA										
Inta-Roto Unit #3										
Coating	0.00	0.00	0.90	0.00	0.00	0.04	0.00	0.00	0.00	0.00
Adhesive	0.00	0.00	0.74	0.00	0.00	0.00	0.00	0.00	0.00	0.84
Ink	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NA										
Inta-Roto Unit #4										
Coating	0.00	0.00	0.76	0.00	0.00	0.03	0.00	0.00	0.00	0.00
Adhesive	0.00	0.00	0.63	0.00	0.00	0.00	0.00	0.00	0.00	0.71
Ink	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NA										
Inks	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glues	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
All Formers										
Inks	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glues	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Corrugator										
Inks	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.06	0.01	1.80
glue										
Total:	0.00	0.00	4.03	0.00	0.00	0.09	0.03	0.06	0.01	3.88

Total HAPs: 8.10

Methodology

Heat set offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100% (Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93)).

Calculations are based on operation at rated capacity for 8760 hrs/year; maximum hourly usage based on 2011 operation data provided by the source; maximum weight VOC and HAPs determined based on weight % VOC of inks used in 2011; maximum plate coverage (lbs/MMin²) based on industry-specific Fiber Box Association numbers; maximum line speed based on the max. speed of the unit

Glycol ethers are included in the HAP calculations, even though US EPA no longer considers glycol ethers to be HAPs, because the manufacturer % content of the glycol ether group of compounds is proprietary and could not be obtained or verified by the source.

Corrugator throughput (MMin²/yr) = Maximum Line Speed (ft/min) * Maximum Print Width (in) * (12 in/ft) * (60 min/hr) * (8760 hr/yr) * (1 MM/1,000,000). Former throughput based on full board width of corrugator throughput.

HAP emissions (tons/yr) = Maximum Coverage (lbs/MMin²) * Flash Off (%) * Throughput (MMin²/yr) * Weight % HAP * (1 ton/2000 lbs)

HAPs for individual inks are not available, percent of individual HAPs based on the worst case monthly average percent.

All Formers includes all nine foming units in the 1100 building.

**Appendix A: Emission Calculations
Trivial Activities**

**Company Name: RockTenn - Plymouth
Address: 1000 - 1100 Pidco Road, Plymouth IN 46563
Permit No.: 099-32585-00050
Reviewer: Bruce Farrar
Date: December 3, 2012**

Trivial Activities: Parts Washer, Maintenance Machining, & Maintenance Welding

Parts Washer

VOC

Emission Unit - Material	Size (gal)	Max. Potential Loss (gal/yr)	Density (lbs/gal)	Weight % VOC	VOC Emissions (lbs/hr)	VOC Emissions (tons/yr)
Zep Dyna 143	30.0	30.0	6.58	100.0%	0.02	0.10

HAPs

Emission Unit - Material	Weight % Xylene	Weight % Naphthalene	Weight % Benzene	Xylene Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Benzene Emissions (tons/yr)
Zep Dyna 143	0.0%	0.2%	0.1%	0.000	0.000	0.000

Methodology

VOC Emissions (lbs/hr) = Max. Potential Loss (gal/yr) * Density (lbs/gal) * Weight % VOC * (1 yr/8760 hrs)
VOC Emissions (tons/yr) = Max. Potential Loss (gal/yr) * Density (lbs/gal) * Weight % VOC * (1 ton/2000 lbs)
HAP Emissions (tons/yr) = Max. Potential Loss (gal/yr) * Density (lbs/gal) * Weight % HAP * (1 ton/2000 lbs)
Information n breakdown of solvent lists "c "other benzenes" assumed all compounds in this category were benzene
Max usage based on 3X actual usage of 1-30 gal drum every three years.

Maintenance Machining

Activity	Maximum Throughput (tons/yr)	Emission Factor (lb/ton)	PM Emissions (tons/yr)
Maintenance Machining	8.0	0.1	0.0004

Methodology

PM Emissions (tons/yr) = Maximum Throughput (tons/yr) * Emission Factor (lb/ton) * (1 ton/2000 lbs)
Emission Factor is from US EPA's AP 42, Chapter 12.5, Table 12.5-1.
Used default for Max Throughput

Maintenance Welding

Activity	Maximum Throughput	Units	Emission Factor (lb/lb electrode)	Emission Factor (lb/1000 in cut)	PM Emissions (tons/yr)
Maintenance Welding - Electric Arc	50.0	lb electrode/yr	0.036	-	0.0009
Maintenance - Oxyacetylene	100.0	1000 in cut/yr	-	0.162	0.0081
total					0.0090

MIG wire

Methodology

Electric Arc PM Emissions (tons/yr) = Maximum Throughput (lb electrode/yr) * Emission Factor (lb/lb electrode) * (1 ton/2000 lbs)
Oxyacetylene PM Emissions (tons/yr) = Maximum Throughput (1000 in cut/yr) * Emission Factor (lb/1000 in cut) * (1 ton/2000 lbs)
Welding and other flame cutting emission factors are from an internal IDEM document, "Welding and Flame Cutting". Refer to US EPA's AP 42, Chapter 12.19 for additional emission factors for welding.
Oxyacetylene torches are used primarily for heating equipment such as bearings and not cutting. 100 cuts assumed based on usage rate of one cetylene cylinder per year.

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2		Chris Stoler VP/ GM RockTenn CP, LLC 1000 Pidco Dr Plymouth IN 46563 (RO CAATS)									
3		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)									
4		Plymouth City Council and Mayors Office 124 N Michigan St Plymouth IN 46563 (Local Official)									
5		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)									
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