



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

For PaperWorks Industries in Wabash County

Part 70 Operating Permit Renewal No. T169-33477-00002

The Indiana Department of Environmental Management (IDEM) has received an application from PaperWorks Industries located at 455 West Factory Street, Wabash, Indiana 46992 for a renewal of its Part 70 Operating Permit issued on May 1, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow PaperWorks Industries to continue to operate its existing source.

This draft Title V Operating Permit Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes (exchanges that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Wabash Carnegie Public Library
188 West Hill Street
Wabash, IN 46992

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number 097-33477-00002 in all correspondence.



Comments should be sent to:

Daniel W Pell
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8532
Or dial directly: (317) 234-8532
Fax: (317)-232-6749 attn: Daniel W Pell
E-mail: dpell@idem.in.gov

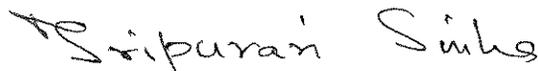
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Daniel W Pell of my staff at the above address.



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

dwp



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DRAFT

**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**PaperWorks Industries, Inc.
455 West Factory Street,
Wabash, Indiana 46992**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|--|------------------|
| Operation Permit No.: T169-33477-00002 | |
| Issued by: | Issuance Date: |
| Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality | Expiration Date: |

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary stationary coated boxboard manufacturing operation.

| | |
|------------------------------|---|
| Source Address: | 455 West Factory Street,, Wabash, Indiana 46992 |
| General Source Phone Number: | 260-563-3102 |
| SIC Code: | 2631 |
| County Location: | Wabash |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Major Source, under PSD Rules Area Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

**A.2 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]**

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

- (a) One (1) natural gas-fired boiler (B04), with No.2 fuel oil as back-up, identified as EU#01, exhausted through Stack 2, originally constructed in 1975 at another location and installed in 2001 at this location, rated at 214.0 million British thermal units per hour when burning natural gas and 205.0 million British thermal units per hour when burning No. 2 fuel oil;
- (b) Two hundred twenty (220) paper machine steam dryers, identified as EU#02, installed before 1953 (32 replaced in 1993), for drying the moisture laden paper sheet before the coating application, capacity: 31.0 tons of boxboard per hour; and
- (c) Two (2) roll coaters (machines #1 and #2), identified as EU#03, installed before 1970, capacity: 31.0 tons of boxboard per hour.

**A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]**

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2];
- (c) Cleaners and solvents characterized as follows:

- (1) having a vapor pressure equal to or less than two (2) kiloPascals; fifteen (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; five (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 twelve (12) months;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, and welding equipment; and
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T169-33477-00002, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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 [326 IAC 2-7-7] [IC 13-17-12]

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 [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (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 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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 annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T169-33477-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 nine (9) months 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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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 2-7-5(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 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[326 IAC 2-2][326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- 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) 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.
- (d) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired boiler (B04), with No. 2 fuel oil as back-up, identified as EU#01, exhausted through Stack 2, originally constructed in 1975 at another Jefferson Smurfit location and installed in 2001 at this location, rated at 214.0 million British thermal units per hour when burning natural gas and 205.0 million British thermal units per hour when burning No. 2 fuel oil.

(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 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Permit Modification 169-14891-00002, issued on January 7, 2002:

- (a) The total input of natural gas to boiler (BO4), identified as EU#01, shall be limited to less than 1,835.7 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month. This natural gas limit is equivalent to less than 257 tons per year of NO_x. Compliance with this limit renders the requirements of 326 IAC 2-2 (PSD) not applicable.
- (b) For purpose of determining compliance based on NO_x emissions, each one (1) kilogallon of No. 2 fuel oil burned is equivalent to 0.0857 million cubic feet of natural gas.

D.1.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from boiler (BO4), identified as EU#01 shall in no case exceed 0.27 pounds of particulate matter per million British thermal units heat input as calculated below:

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

Where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation 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. Q is equal to 214 million British thermal units per hour.

$$Pt = \frac{1.09}{214^{0.26}} = 0.27 \text{ pounds per million British thermal units (MMBtu)}$$

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the boiler (BO4), identified as EU#01, rated at two hundred five (205) MMBtu per hour when oil-fired, shall not exceed five-tenths (0.5) pound per million British thermal units (MMBtu) heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for this unit and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

Compliance with Condition D.1.3 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler (BO4), identified as EU#01, rated at two hundred five (205) MMBtu per hour when oil-fired, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler (BO4), identified as EU#01, stack (Stack 2) exhausts shall be performed during normal daylight operations when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. The fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of visible emission notations of the boiler (BO4), identified as EU#01, stack (2) exhaust and record when a visible emission notation is not taken, such as when burning natural gas.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.1.8 Reporting Requirements

- (a) A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each calendar quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

- (b) The natural gas boiler certification shall be submitted using the reporting forms located at the end of this permit, or its equivalent, no later than thirty (30) days following the end of the six (6) month period being reported. The natural gas-fired boiler certification submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2].
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than two (2) kiloPascals; fifteen (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; five (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 twelve (12) months [326 IAC 8-3-2].

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980 (Maintenance shop, electric shop, and main floor storage area), the Permittee shall ensure the following control equipment and operating requirements are met:

- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM emissions from the trimmers, grinding and machining equipment, deburring, buffing, polishing, abrasive blasting, pneumatic conveying, plasma cutting, woodworking, as well as oxyacetylene and plasma cutting shall not exceed the allowable PM emission rate based on the following equation:

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

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

The fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators shall be in operation at all times when the grinding and machining operations are in use.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for these units and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: PaperWorks Industries, Inc.
Source Address: 455 West Factory Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-33477-00002

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: PaperWorks Industries, Inc.
Source Address: 455 West Factory Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-33477-00002

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile no later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: PaperWorks Industries, Inc.
Source Address: 455 West Factory Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-33477-00002

| |
|--|
| <input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____ |
|--|

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: _____ |
| Printed Name: _____ |
| Title/Position: _____ |
| Phone: _____ |
| Date: _____ |

A certification by the responsible official as defined by 326 IAC 2-7-1(35) is required for this report.

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

Part 70 Quarterly Report

Source Name: PaperWorks Industries, Inc.
Source Address: 455 West Factory Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-33477-00002
Facility: Boiler (BO4), known as EU#01
Parameter: Natural Gas and No.2 Fuel Oil Usage
Limit: Less than 1,835.7 million cubic feet of natural gas per twelve (12) consecutive month period with compliance determined at the end of each month.

For the purpose of this NOX limit, each kilogallon of No. 2 fuel oil burned in this boiler shall be equivalent to 0.857 million cubic feet of natural gas.

QUARTER:

YEAR:

| Month | Natural Gas Including Equivalent No. 2 Fuel Oil (MMCF) | Natural Gas Including Equivalent No. 2 Fuel Oil (MMCF) | Natural Gas Including Equivalent No. 2 Fuel Oil (MMCF) |
|---------|--|--|--|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification that meets the requirements of 326 IAC 2-7-6(1) to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: PaperWorks Industries, Inc.
Source Address: 455 West Factory Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-33477-00002

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|--|--------------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> | |
| <p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p> | |
| <p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification that meets the requirements of 326 IAC 2-7-6 (1) to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

| | |
|----------------------------|---|
| Source Name: | PaperWorks Industries, Inc. |
| Source Location: | 455 West Factory Street, Wabash, Indiana 46992 |
| County: | Wabash |
| SIC Code: | 2631 |
| Permit Renewal No.: | T169-33477-00002 |
| Permit Reviewer: | Daniel W Pell |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from PaperWorks Industries, Inc., relating to the operation of a stationary coated boxboard manufacturing operation. On July 26, 2013, PaperWorks Industries, Inc. submitted an application to the OAQ requesting to renew its operating permit. PaperWorks Industries, Inc. was issued its second Part 70 Operating Permit Renewal, T169-27031-00002 on May 1, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) natural gas-fired boiler (B04), with No.2 fuel oil as back-up, identified as EU#01, exhausted through Stack 2, originally constructed in 1975 at another location and installed in 2001 at this location, rated at 214.0 million British thermal units per hour when burning natural gas and 205.0 million British thermal units per hour when burning No. 2 fuel oil;
- (b) Two hundred twenty (220) paper machine steam dryers, identified as EU#02, installed before 1953 (32 replaced in 1993), for drying the moisture laden paper sheet before the coating application, capacity: 31.0 tons of boxboard per hour; and
- (c) Two (2) roll coaters (machines #1 and #2), identified as EU#03, installed before 1970, capacity: 31.0 tons of boxboard per hour.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2];
- (c) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than two (2) kiloPascals; fifteen (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; five (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 twelve (12) months;

- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, and welding equipment; and
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

Existing Approvals

The source was issued the Second Part 70 Operating Permit Renewal T169-27031-00002, on May 1, 2009. There have been no subsequent approvals issued.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Wabash County.

| Pollutant | Designation |
|-------------------|--|
| SO ₂ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹ |
| PM _{2.5} | Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Unclassifiable or attainment effective December 31, 2011. |

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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. Wabash 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}**
Wabash 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**
Wabash County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and P_b. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source based on worst case scenarios.

| Unrestricted Potential Emissions | |
|----------------------------------|-----------------|
| Pollutant | Tons/year |
| PM | 45.02 |
| PM ₁₀ | 45.45 |
| PM _{2.5} | 43.85 |
| SO ₂ | 457.36 |
| VOC | 140.51 |
| CO | 81.73 |
| NO _x | 268.45 |
| GHGs as CO ₂ e | 138,423/138,438 |
| Single HAP | 9.34 |
| Total HAP | 11.11 |

| HAPs | tons/year |
|----------|-----------|
| Hexane | 1.69 |
| Selenium | 0.01 |
| DGME | 9.34 |
| Total | 11.04 |

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of SO₂, NO_x, and VOC, are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is equal to or greater than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | | |
|---|--|--------------------|----------------------|-----------------|-----------------|---------------|--------------|---------------------------|--------------|------------------|
| | PM | PM ₁₀ * | PM _{2.5} ** | SO ₂ | NO _x | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Boiler (B04),EU #01 | 12.83 | 15.26 | 13.66 | 455.4 | 262.5 | 5.16 | 78.73 | 138423 | 1.76 | 1.69 Hexane |
| Paper Drying, EU #02 | - | - | - | - | - | 113.29 | - | - | 9.34 | 9.34 DGME |
| Paper Coating, EU #03 | 22.19 | 22.19 | 22.19 | - | - | 12.06 | - | - | negl. | negl. |
| Insignificant Activities | 10.00 | 8.00 | 8.00 | 2.00 | 6.00 | 10.00 | 3.00 | - | negl. | negl. |
| Total PTE of Entire Source | 45.02 | 45.45 | 43.85 | 457.4 | 268.5 | 140.51 | 81.73 | 138423 | 11.11 | 9.34 DGME |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 CO ₂ e | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | 100,000 CO ₂ e | NA | NA |
| negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . | | | | | | | | | | |

- (a) This existing stationary source is major for PSD because the emissions of at least one regulated pollutant are greater than two hundred fifty (>250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) GHG emissions are equal to or greater than one hundred thousand (>100,000) tons of CO₂ equivalent (CO₂e) emissions per year.

| |
|-----------------------------------|
| Federal Rule Applicability |
|-----------------------------------|

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the 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 any of the existing units as part of this Part 70 permit renewal.

- (b) The requirements of the New Source Performance Standard for Standards of Performance for Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60.40, Subpart Db, are not included in the permit for the natural gas-fired boiler (B04), identified as EU#01, with No.2 fuel oil as back-up, installed in 2001. Construction of this unit commenced in 1975, prior to the June 19, 1984 applicability date of this rule.
- (c) The insignificant degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T,

(Halogenated Solvent Cleaning Machine NESHAP) because it uses a petroleum-based solvent (Actrel PC 95 Cleaner) which is not part of the applicability as specified in 40 CFR Part 63, Subpart T.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart KK, (National Emission Standards for the Printing and Publishing Industry) are not included in this permit for the two roll-coaters identified as EU#03, because the coating process does not involve rotogravure or flexographic printing, even though the source is a major source of hazardous air pollutants (HAP).
- (e) In a letter to the American Forest and Paper Association, EPA indicated that size presses or size press alternatives (SP/SPA) and on-machine coaters that apply sizing or water-based clay as component of the paper making system are still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Paper and other Web Coating, 40 CFR 63, Subpart JJJJ. The coating operation at PaperWorks Industries, Inc. is on-machine water-based clay coating. Therefore, 40 CFR 63, Subpart JJJJ does not apply. The source is a major source of hazardous air pollutants (HAP).
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.

| |
|---|
| State Rule Applicability - Entire Source |
|---|

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3, every three (3) years. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2.

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.

| |
|---|
| State Rule Applicability – Individual Facilities |
|---|

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

The natural gas-fired boiler (BO4) identified as EU#01, using No. 2 fuel oil backup, and rated at a maximum of 214 million British thermal units (MMBtu) per hour when burning natural gas, and 205 MMBtu when burning fuel oil received a permit to construct after the September 21, 1983 applicability date, and is therefore, subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating).

Pursuant to 326 IAC 6-2-4, the PM emissions from the boiler (BO4), identified as EU#01, shall be limited to the pounds per million British thermal units heat input as calculated below.

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

Where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total capacity of all boilers in 2001.

$$Pt = \frac{1.09}{214^{0.26}} = 0.27 \text{ pounds per million British thermal units.}$$

The following calculations represent the ability of the source to comply with this limit when using either natural gas or No. 2 fuel oil:

$$\text{Fuel oil} = (2.76 \text{ lbs/hr} / 205 \text{ MMBtu/hr}) = 0.013 \text{ lbs of PM per MMBtu}$$

Therefore, the boiler (BO4), identified as EU#01, is able to comply with this rule when burning No. 2 fuel oil.

$$\text{Natural Gas} = (0.41 \text{ lbs/hr} / 214 \text{ MMBtu/hr}) = 0.0019 \text{ lbs of PM per MMBtu}$$

Therefore, the boiler (BO4), identified as EU#01, is able to comply with this rule when burning natural gas.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- a.) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM emissions from the trimmers, grinding and machining equipment, deburring, buffing, polishing, abrasive blasting, pneumatic conveying, plasma cutting, woodworking, as well as oxyacetylene and plasma cutting shall be limited by the following:

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

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

The fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators shall be in operation at all times the grinding and machining operations are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-1(b)(6), the existing paper coating operations are not subject to the requirements of 326 IAC 6-3-2 because the facilities use roll coaters which do not generate particulate and are exempt from this rule.
- (c) Pursuant to 326 IAC 6-3-1(b)(9) and (10), the insignificant manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, and welding equipment are not subject to the requirements of 326 IAC 6-3-2 because the material usage in these facilities is below the exemption levels specified in this rule.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Since the potential to emit sulfur dioxide exceeds twenty-five (25) tons per year, the boiler (BO4), identified as EU#01, is subject to 326 IAC 7-1.1. Pursuant to 326 IAC 7-1.1, sulfur dioxide (SO₂) emissions from this boiler when burning fuel oil shall be limited to 0.5 pounds per

million British thermal units (MMBtu) heat input. This equates to a fuel oil sulfur content limit of 0.5%.

326 IAC 8-1-6 (BACT)

- (a) The potential VOC emissions from the natural gas-fired boiler (B04), identified as EU#01, are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply.
- (b) The surface coating operations and paper machine steam dryers are not subject to the requirements of this rule because the facilities were constructed prior to the applicability date of this rule.

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

Pursuant to 326 IAC 8-2-1, the existing paper coating operations are not subject to the requirements of this rule because the facilities were constructed prior to January 1, 1980, the applicability date of this rule, and the source is not located in one of the specified counties in this rule.

326 IAC 8-3-2 (Volatile Organic Compounds)

This source is subject to the Organic Solvent Degreasing Operations (326 IAC 8-3) rules specified in 326 IAC 8-3-2.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1 (Organic Solvent Emission Limitations), the surface coating operations and paper machines are not subject to the requirements of this rule because the source was constructed prior to October 7, 1974.

| |
|---|
| Compliance Determination and Monitoring Requirements |
|---|

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The natural gas-fired with No. 2 fuel oil back-up boiler (B04), identified as EU#01, has applicable compliance determination conditions as specified below:

- (a) Pursuant to 326 IAC 3-7-4, compliance with the sulfur dioxide emissions limit of five tenths (0.5) pound per MMBtu heat input shall be determined utilizing one of the following options:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (3) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler (B04), identified as EU#01, rated at two hundred five (205) MMBtu per hour when oil-fired, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) above shall not be refuted by evidence of compliance pursuant to the other methods.

The compliance monitoring requirements applicable to this source are as follows:

The natural gas-fired with No. 2 fuel oil back-up boiler (B04), identified as EU#01, has applicable compliance monitoring conditions as specified below:

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|--|-------------------|-----------|---------------------|----------------------------|
| Boiler (B04),EU #01 (when burning fuel oil) | Visible Emissions | Daily | Normal- Abnormal | Response Steps |

These monitoring conditions are necessary to show compliance with the requirements of 326 IAC 5-1 and 326 IAC 6-2.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 26, 2013.

Conclusion

The operation of this existing stationary coated boxboard manufacturing operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T169-33477-00002.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Daniel W Pell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8532 or toll free at 1-800-451-6027 extension 4-8532.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

Source Summary

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Reviewer: Daniel W Pell

Unrestricted Emissions - Worst case emissions when considering natural gas and fuel oil #2

| Emission Unit | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | VOC | CO | GHG/CO _{2e} | Single HAP | | Total HAPS |
|--------------------------|-------|------------------|-------------------|-----------------|-----------------|--------|-------|----------------------|------------|--------|------------|
| Boiler (B04) EU#01 * | 12.83 | 15.26 | 13.66 | 455.36 | 262.45 | 5.16 | 78.73 | 138423 | 1.69 | Hexane | 1.769 |
| Paper Drying EU#02 | - | - | - | - | - | 113.29 | - | - | 9.34 | DGME | 9.34 |
| Paper Coating EU#03 | 22.19 | 22.19 | 22.19 | - | - | 12.06 | - | - | negl. | - | negl. |
| Insignificant Activities | 10.00 | 8.00 | 8.00 | 2.00 | 6.00 | 10.00 | 3.00 | - | negl. | - | negl. |
| TOTAL | 45.02 | 45.45 | 43.85 | 457.36 | 268.45 | 140.51 | 81.73 | 138423 | 9.34 | DGME | 11.11 |

* Based upon worst case for each pollutant.

Limited Emissions

| Emission Unit | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | VOC | CO | GHG/CO _{2e} | Single HAP | | Total HAPS |
|---------------------------------|-------|------------------|-------------------|-----------------|-----------------|--------|-------|----------------------|------------|--------|------------|
| Boiler (B04) EU#01 (Worst Case) | 12.83 | 15.26 | 13.66 | 455.36 | 262.45 | 5.16 | 78.73 | 138423 | 1.69 | Hexane | 1.769 |
| Paper Drying EU#02 | - | - | - | - | - | 113.29 | - | - | 9.34 | DGME | 9.34 |
| Paper Coating EU#03 | 22.19 | 22.19 | 22.19 | - | - | 12.06 | - | - | negl. | - | negl. |
| Insignificant Activities | 10.00 | 8.00 | 8.00 | 2.00 | 6.00 | 10.00 | 3.00 | - | negl. | - | negl. |
| TOTAL | 45.02 | 45.45 | 43.85 | 457.36 | 268.45 | 140.51 | 81.73 | 138423 | 9.34 | DGME | 11.11 |

**Appendix A: Emissions Calculations
HAPS & VOC
From Paper Drying Operations - Paper Drying EU #02**

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Reviewer: Daniel W Pell

Paper Drying EU#02

| Material | 1997 Material Usage (lbs/yr) | VOC Content (%) | VOC Emissions 1997 (lbs/yr) | VOC Emissions 1997 (tons/yr) | #of Hrs of Operation 1997 | Potential VOC (tons/yr) | Methanol Weight Percent (%) | Ethylene Glycol Weight Percent (%) | DGME Weight Percent (%) | HAPS Emissions Methanol (tons/yr) | HAPS Emissions Ethylene Glycol (tons/yr) | HAPS Emissions DGME (tons/yr) |
|---|------------------------------------|-----------------------|-----------------------------------|------------------------------------|---------------------------------|-------------------------------|-----------------------------------|--|-------------------------------|---|--|-------------------------------------|
| DREWFLOC 2421 | 151032.00 | 35.00% | 52861.200 | 26.431 | 8520 | 27.175 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| HERCOBOND 6950 | 113144.00 | 69.57% | 78714.281 | 39.357 | 8520 | 40.466 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| SPECTRUM XD3899 | 127345.00 | 35.00% | 44570.750 | 22.285 | 8520 | 22.913 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| ADVANTAGE 1490/1529 | 188312.00 | 10.00% | 18831.200 | 9.416 | 8520 | 9.681 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| LURDER VM | 7723.00 | 25.00% | 1930.750 | 0.965 | 8520 | 0.993 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| | 0.00 | 0.00% | 0.000 | 0.000 | 8520 | 0.000 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| | 0.00 | 0.00% | 0.000 | 0.000 | 8520 | 0.000 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| | 0.00 | 0.00% | 0.000 | 0.000 | 8520 | 0.000 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| | 0.00 | 0.00% | 0.000 | 0.000 | 8520 | 0.000 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| HI CYCLE 110 | 91288.00 | 1.00% | 912.880 | 0.456 | 8520 | 0.469 | 0.0000% | 0.0000% | 0.0000% | 0.00 | 0.00 | 0.00 |
| GAL 1021 | 71811.00 | 15.00% | 10771.650 | 5.386 | 8520 | 5.538 | 0.0000% | 0.0000% | 10.0000% | 0.00 | 0.00 | 2.92 |
| GAL 2081 | 42860.00 | 15.00% | 6429.000 | 3.215 | 8520 | 3.305 | 0.0000% | 0.0000% | 10.0000% | 0.00 | 0.00 | 2.92 |
| GAL 3001 | 21407.00 | 25.00% | 5351.750 | 2.676 | 8520 | 2.751 | 0.0000% | 0.0000% | 20.0000% | 0.00 | 0.00 | 3.50 |
| Potential VOC Emissions | | | | | | 113.3 | | | | | | |
| worst case coating added to all solvents | | | | | | Total | 113.3 | | | | | |
| Total (tons/yr) | | | | | | | | | | 0.000 | 0.000 | 9.344 |
| (lbs/hr) | | | | | | | | | | 0.000 | 0.000 | 2.133 |
| (g/sec) | | | | | | | | | | 0.0000 | 0.0000 | 0.2688 |

DGME = Di-Ethylene Glycol Monomethyl Ether

| | |
|---|-------------|
| Grand Total HAPs (tons/year) | 9.34 |
|---|-------------|

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Paper Coating EU #03**

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Reviewer: Daniel W Pell

Paper Coating EU#03

| Material | Density (Lb/Gal) | Weight % Volatile (H2O& Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential ton/yr | lb VOC /gal solids | Transfer Efficiency |
|-------------------|------------------|-----------------------------------|----------------|-------------------|----------------|---------------------------|-----------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|------------------------------|--------------------|---------------------|
| Coating | 12.28 | 5.38% | 5.30% | 0.08% | 7.83% | 58.50% | 2.81 | 31.00 | 0.01 | 0.01 | 0.86 | 20.54 | 3.75 | 4.43 | 0.02 | 99.9% |
| Calendar Solution | 11.60 | 14.60% | 14.56% | 0.04% | 9.21% | 44.40% | 13.20 | 31.00 | 0.01 | 0.00 | 1.90 | 45.57 | 8.32 | 17.76 | 0.01 | 99.9% |

METHODOLOGY

| | | | | |
|--------------|-------------|--------------|--------------|--------------|
| TOTAL | 2.75 | 66.11 | 12.06 | 22.19 |
|--------------|-------------|--------------|--------------|--------------|

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100
Utility Boiler (BO4) EU #01**

Company Name: PaperWorks Industries, Inc.
Address City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Pit ID: 169-00002
Reviewer: Daniel W Pell

Heat Input Capacity
MMBtu/hr

214.0

Potential Throughput
MMCF/yr

1874.6

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|-----|-------------|-----|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 280.0 | 5.5 | 84.0 |
| | | | | | **see below | | |
| Potential Emission in tons/yr | 1.8 | 7.1 | 7.1 | 0.6 | 262.4 | 5.2 | 78.7 |

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

PM2.5 emission factor is condensable and filterable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MMBTU/HR >100
 Utility Boiler (BO4) EU #01
 HAPs Emissions**

Company Name: PaperWorks Industries, Inc.
Address City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Pit ID: 169-00002
Reviewer: Daniel W Pell

| HAPs - Organics | | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|----------------------|--------------------|--------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 | |
| Potential Emission in tons/yr | 1.97E-03 | 1.12E-03 | 7.03E-02 | 1.69E+00 | 3.19E-03 | 1.76E+00 |
| HAPs - Metals | | | | | | |
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 | |
| Potential Emission in tons/yr | 4.69E-04 | 1.03E-03 | 1.31E-03 | 3.56E-04 | 1.97E-03 | 5.14E-03 |
| | | | | | TOTAL | 1.769 |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MMBTU/HR >100
 Utility Boiler (BO4) EU #01
 Greenhouse Gas Emissions**

Company Name: PaperWorks Industries, Inc.
Address City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Pit ID: 169-00002
Reviewer: Daniel W Pell

| | Greenhouse Gas | | |
|--|----------------|-----|-----|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 112,478 | 2.2 | 2.1 |
| Summed Potential Emissions in tons/yr | 112,483 | | |
| CO2e Total in tons/yr based on 11/29/2013 federal GWPs | 113,147 | | |
| CO2e Total in tons/yr based on 10/30/2009 federal GWPs | 113,163 | | |

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) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
 CO2e (tons/yr) based on 10/30/2009 federal GWPs = 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: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Boiler (B04) EU #01
#1 and #2 Fuel Oil as a Back-Up Fuel

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Plt ID: 169-00002
Reviewer: Daniel W Pell

Heat Input Capacity Potential Throughput S = Weight % Sulfur
MMBtu/hr kgals/year 0.5

205 12827.14286

| Emission Factor in lb/kgal | Pollutant | | | | | | |
|-------------------------------|-----------|------|--------------|----------------|-------|------|------|
| | PM* | PM10 | direct PM2.5 | SO2 | NOx | VOC | CO |
| | 2.0 | 2.4 | 2.1 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 12.8 | 15.3 | 13.7 | 455.4 | 128.3 | 2.2 | 32.1 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Boiler (B04) EU #01
#1 and #2 Fuel Oil as a Back-Up Fuel
HAPs Emissions

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Plt ID: 169-00002
Reviewer: Daniel W Pell

| HAPs - Metals | | | | | | |
|-------------------------------|--------------------|----------------------|--------------------|---------------------|-----------------|----------|
| Emission Factor in lb/mmBtu | Arsenic 4.0E-06 | Beryllium 3.0E-06 | Cadmium 3.0E-06 | Chromium 3.0E-06 | Lead 9.0E-06 | |
| Potential Emission in tons/yr | 3.59E-03 | 2.69E-03 | 2.69E-03 | 2.69E-03 | 8.08E-03 | 1.98E-02 |

| HAPs - Metals (continued) | | | | | |
|-------------------------------|--------------------|----------------------|-------------------|---------------------|----------|
| Emission Factor in lb/mmBtu | Mercury 3.0E-06 | Manganese 6.0E-06 | Nickel 3.0E-06 | Selenium 1.5E-05 | |
| Potential Emission in tons/yr | 2.69E-03 | 5.39E-03 | 2.69E-03 | 1.35E-02 | 2.42E-02 |

TOTAL 0.044

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

See Page 3 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Boiler (B04) EU #01
#1 and #2 Fuel Oil as a Back-Up Fuel
Greenhouse Gas Emissions

Company Name: PaperWorks Industries, Inc.
Address, City IN Zip: 455 West Factory Street, Wabash, Indiana 46992
Permit Number: T169-33477-00002
Plt ID: 169-00002
Reviewer: Daniel W Pell

| | Greenhouse Gas | | |
|--|----------------|-------|------|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/kgal | 21,500 | 0.216 | 0.26 |
| Potential Emission in tons/yr | 137,892 | 1.4 | 1.7 |
| Summed Potential Emissions in tons/yr | 137,895 | | |
| CO2e Total in tons/yr based on 11/29/2013 federal GWPs | 138,423 | | |
| CO2e Total in tons/yr based on 10/30/2009 federal GWPs | 138,438 | | |

Methodology

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.

Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)

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

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

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

CO2e (tons/yr) based on 10/30/2009 federal GWPs = 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).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

February 25, 2014

Mr. Samuel Atwood
PaperWorks Industries
455 W Factory St
Wabash, IN 46992

Re: Public Notice
PaperWorks Industries
Permit Level: Title V - Renewal
Permit Number: 169 - 33477 - 00002

Dear Mr. Atwood:

Enclosed is a copy of your draft Title V - Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Wabash Carnegie Public Library, 188 W Hill St in Wabash IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Wabash Plain Dealer in Wabash, In publish this notice no later than March 1, 2014.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Daniel Pell, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-8532 or dial (317) 234-8532.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 25, 2014

Wabash Plain Dealer
Attn: Classifieds
123 West Canal Street
Wabash, Indiana 46992

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for PaperWorks Industries, Wabash County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 1, 2014.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Renewal
Permit Number: 169 - 33477 - 00002

Enclosure
PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

February 25, 2014

To: Wabash Carnegie Public Library 188 W Hill St Wabash IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: PaperWorks Industries
Permit Number: 169 - 33477 - 00002

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

February 25, 2014
PaperWorks Industries
169 - 33477 - 00002

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

February 25, 2014

A 30-day public comment period has been initiated for:

Permit Number: 169 - 33477 - 00002
Applicant Name: PaperWorks Industries
Location: Wabash, Wabash County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 3/13/2013

Mail Code 61-53

| | | | | |
|----------------------------|---|---|--|--|
| IDEM Staff | LPOGOST 2/25/2014 pn 2/28/14 PaperWorks Industries, Inc. 169 - 33477 - 00002 draft/ | | 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 | Type of Mail: CERTIFICATE OF MAILING ONLY | |

| 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 | | Samuel Atwood PaperWorks Industries, Inc. 455 W Factory St Wabash IN 46992 (Source CAATS) | | | | | | | | | | |
| 2 | | Richard Townley General Manager PaperWorks Industries, Inc. 455 W Factory St Wabash IN 46992 (RO CAATS) | | | | | | | | | | |
| 3 | | Mr. Dennis Becker 7400 Monmouth Road Decatur IN 46733 (Affected Party) | | | | | | | | | | |
| 4 | | Ms. Bonnie Rudenbach 1491 S. 13th Street Decatur IN 46733 (Affected Party) | | | | | | | | | | |
| 5 | | Louis & Vera Walpert 1034 High Street Decatur IN 46733 (Affected Party) | | | | | | | | | | |
| 6 | | Ms. Lou Anne Steven 1015 Crosse Pointe Decatur IN 46733-3317 (Affected Party) | | | | | | | | | | |
| 7 | | Wabash County Commissioners 1 West Hill Street Wabash IN 46992 (Local Official) | | | | | | | | | | |
| 8 | | Wabash City Council and Mayors Office 202 South Wabash Street Wabash IN 46992 (Local Official) | | | | | | | | | | |
| 9 | | Mr. Roy Gill Jr. 3373 W 100 S Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 10 | | Mr. and Mrs. William Cavines 468 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 11 | | Mr. and Mrs. David Ingois 550 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 12 | | Mr. Michael Weibel 436 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 13 | | Mr. Robert Simpson 3954 N 200 W Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 14 | | Mr. Craig McLaughlin 394 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | | |
| 15 | | Mr. and Mrs. Joseph Yarnell 297 N. Miami Street Wabash IN 46992 (Affected Party) | | | | | | | | | | |

| | | | |
|---|--|--|--|
| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|---|--|--|--|

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | LPOGOST 2/25/2014 PaperWorks Industries, Inc. 33477 (draft/final) | | Type of Mail: CERTIFICATE OF MAILING ONLY | 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 | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|--|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
| | | | | | | | | | | | Remarks |
| 1 | | Darlene 540 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | |
| 2 | | Joe Clark 390 W. Canal Street Wabash IN 46992 (Affected Party) | | | | | | | | | |
| 3 | | Wabash County Health Department 89 W. Hill, Memorial Hall Wabash IN 46992-3184 (Health Department) | | | | | | | | | |
| 4 | | Ted Little Wabash County Council 1076 West 900 North North Manchester IN 46962 (Affected Party) | | | | | | | | | |
| 5 | | Wabash Carnegie Public Library 188 W Hill St Wabash IN 46992-3048 (Library) | | | | | | | | | |
| 6 | | Ms. Marjianne Noll 508 West Koch Street Ohio City OH 45874 (Affected Party) | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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