



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

To: Interested Parties

Date: November 7, 2014

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

Source Name: Huhtamaki, Inc.

Permit Level: Title V Operating Permit Renewal

Permit Number: 089-33556-00228

Source Location: 6629 Indianapolis Boulevard
Hammond, Indiana

Type of Action Taken: Permit Renewal

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 33556.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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

**Huhtamaki, Inc.
6629 Indianapolis Blvd
Hammond, Indiana 46320**

(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.

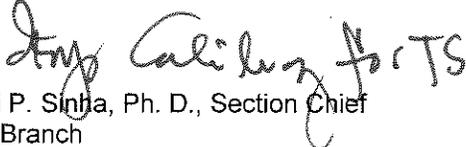
Operation Permit No.: 089-33556-00228	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: November 7, 2014 Expiration Date: November 7, 2019

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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 a stationary manufacturer of molded pulp paper products.

Source Address:	6629 Indianapolis Blvd, Hammond, Indiana 46320
General Source Phone Number:	219-844-8950
SIC Code:	2679
County Location:	Lake
Source Location Status:	Non Attainment for Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset /Nonattainment NSR Rules Major Source under PSD Rule Minor 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) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.

- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.

- (c) Three (3) Molded Pulp Dryers identified as 008, 009 and 010, each with a maximum heat input capacity of 11.50 MMBtu/hr, each constructed on 1947, and exhausting to stacks identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.

- (d) One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, installed in 1947, natural gas-fired only, with a maximum design capacity of 23 MMBtu/hr and exhausting to Stack 11.

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:

- (1) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (2) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (3) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (5) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (6) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (7) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (8) Other emergency equipment as follows:
Stationary electrically driven fire pumps.
- (9) Two (2) electric laminators following Molded Pulp Dryer No. 4 and two (2) electric laminators following Molded Pulp Dryer No. 1.

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, T089-33556-00228, 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 April 15 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 or Northwest Regional Office 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
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (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 089-33556-00228 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(40). 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 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 twenty percent (20%) 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.2 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.3 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.4 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.5 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.6 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.7 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.8 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.9 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.10 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.11 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.12 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.13 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.14 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]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) 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(32) ("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.15 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.16 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.17 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 FACILITY OPERATION CONDITIONS

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

Nine (9) Molded Pulp Dryers No. 1 – 6 & 8 – 10, identified as Units 001 – 006 and 008 - 010, each constructed in 1947 and utilizing natural gas:

- (a) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.

- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.

- (c) Three (3) Molded Pulp Dryers identified as 008, 009 and 010, each with a maximum heat input capacity of 11.50 MMBtu/hr, each constructed on 1947, and exhausting to stacks identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.

(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.1.1 Particulate Matter less than 10 microns (PM10) [326 IAC 6.8-2-34]

Pursuant to 326 IAC 6.8-2-34 (Lake County PM10 emission requirements for Huhtamaki Foodservice, Inc.), the PM10 emissions related to each facility listed below shall not exceed the following allowable PM10 emission rates:

Emission Unit	EMISSION LIMIT	
	lbs/ton	lb/hr
Molded pulp dryer number 1	0.546	0.210
Molded pulp dryer number 2	0.546	0.250
Molded pulp dryer number 3	0.546	0.290
Molded pulp dryer number 4	0.546	0.290
Molded pulp dryer number 5	0.546	0.130
Molded pulp dryer number 6	0.546	0.130
Molded pulp dryer number 8	0.546	0.350
Molded pulp dryer number 9	0.546	0.410
Molded pulp dryer number 10	0.546	0.350

Note: These PM10 limits are filterable only.

D.1.2 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (a)(Particulate Matter Limitations Lake County), particulate matter (PM) emissions from the Molded Pulp Dryers shall be limited to 0.03 grain per dry standard cubic foot of exhaust air each.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1 and pursuant to 326 IAC 6.8-4-1(1), the Permittee shall perform PM10 testing utilizing Methods 201 or 201A or other methods as approved by the Commissioner on at least one (1) of the largest, most frequently used Molded Pulp Dryers utilizing the worst case chemical additive/dye. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the Molded Pulp Dryers Nos. 1 – 6 and 8 -10 stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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 in accordance with Section C-Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of each Molded Pulp Dryer stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (d) One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, installed in 1947, natural gas-fired only, with a maximum design capacity of 23 MMBtu/hr and exhausting to Stack 11.

(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 Particulate Matter less than 10 microns (PM10) and PM [326 IAC 6.8-1-2] [326 IAC 6.8-2-34]

- (a) Pursuant to 326 IAC 6.8-2-34 (Lake County PM10 emission requirements for Huhtamaki Foodservice, Inc.), the PM10 emissions from the Babcock and Wilcox Type FM Boiler shall be limited to less than 0.007 lbs/MMBtu and 0.050 lbs/hr.
- (b) Pursuant to 326 IAC 6.8-1-2 (a)(Particulate Matter Limitations Lake County), particulate matter (PM) emissions from the Babcock and Wilcox Type FM Boiler shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.3 Natural Gas

In order to comply with Condition D.2.1, the source shall burn only natural gas.

SECTION D.3 FACILITY OPERATION CONDITIONS – Insignificant Activities

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

One (1) Cold Cleaner Degreaser, solvent not remotely stored.

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

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaning degreasers without remote solvent reservoirs constructed after July 1, 1990:
- (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 (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
 - (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 Permittee 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 (b)(1)(A) through (D) of this condition 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.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), before 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.3.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-3-8(c)(2), before 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

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

Source Name: Huhtamaki, Inc.
Source Address: 6629 Indianapolis Blvd, Hammond, Indiana 46320
Part 70 Permit No.: 089-33556-00228

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: Huhtamaki, Inc.
Source Address: 6629 Indianapolis Blvd, Hammond, Indiana 46320
Part 70 Permit No.: 089-33556-00228

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), within four (4) 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 within 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: _____

**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: Huhtamaki, Inc.
 Source Address: 6629 Indianapolis Blvd, Hammond, Indiana 46320
 Part 70 Permit No.: 089-33556-00228

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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: _____

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

**Addendum to the Technical Support Document (ATSD) for a
Part 70 Permit Renewal**

Source Background and Description

Source Name:	Huhtamaki, Inc.
Source Location:	6629 Indianapolis Blvd, Hammond, IN 46320
County:	Lake
SIC Code:	2679
Operation Permit No.:	T089-33556-00228
Permit Reviewer:	Diya Bhattacharjee

On June 28, 2014, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville Indiana and The Times in Munster Indiana, stating that Huhtamaki, Inc. had applied for a Part 70 Permit Renewal to renew its operating permit. The notice also stated that the OAQ proposed to issue a Part 70 Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On July 21, 2014, Huhtamaki, Inc. submitted comments to IDEM, OAQ on the draft Part 70 Permit Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Permit:

Comment 1:

Section A.2 (a) of the draft permit [page 5 of 35] should state, much like Section A.2 (b), that two (2) electric laminators follow Molded Pulp Dryer 001 and are considered insignificant activities, to be consistent with Section A.3 (10). Section D.1, Facility Description, should also be modified as above, for consistency.

Response to Comment 1:

IDEM agrees with the recommended changes, since it is a change in description. The permit has been revised as follows:

...

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) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.

- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Nine (9) Molded Pulp Dryers No. 1 – 6 & 8 – 10, identified as Units 001 – 006 and 008 - 010, each constructed in 1947 and utilizing natural gas:

- (a) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.

- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.

- (c) Three (3) Molded Pulp Dryers identified as 008, 009 and 010, each with a maximum heat input capacity of 11.50 MMBtu/hr, each constructed on 1947, and exhausting to stacks identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.

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

...

Comment 2:

There appears to be a discrepancy between previous and currently proposed definitions of PM10.

In the March 2014 version of the TSD calculations, a footnote correctly states:

“Since the PM10 limit in 326 IAC 6.8-2-34 is based on filterable PM only, the PM10 emission factor used is based on filterable PM only.” This was also clearly stated in the current Title V permit (see section D.1.3). In contrast, the June version of the TSD calculation footnote [page 2 of the TSD] states:

“The PM10 emission factor is filterable and condensable PM10 combined.” Since the PM10 emission factor is assumed as being 25% of PM (which is the filterable portion only, as stated above), it cannot include the condensable fraction. Please correct the footnotes. It would also be helpful if this were stated explicitly in the draft permit in section D.1.1, as it is in the current permit at section D.1.3.

Response to Comment 2:

IDEM agrees with the recommended changes, since the previous permits and testing has shown that the PM10 emission factor is based on filterable PM10 only. The permit has been changed to reflect that the PM10 limits are filterable only. Since there are no calculations made that include the condensable fraction, it will be concluded that Huhtamaki, Inc. is PSD major, unless otherwise the source proves that it is a minor source. The permit has been revised as follows:

...

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 a stationary manufacturer of molded pulp paper products.

Source Address:	6629 Indianapolis Blvd, Hammond, Indiana 46320
General Source Phone Number:	219-844-8950
SIC Code:	2679
County Location:	Lake
Source Location Status:	Non Attainment for Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset /Nonattainment NSR Rules Minor Major Source under PSD Rule Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

...

SECTION D.1 FACILITY OPERATION CONDITIONS

...

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

D.1.1 Particulate Matter less than 10 microns (PM10) [326 IAC 6.8-2-34]

Pursuant to 326 IAC 6.8-2-34 (Lake County PM10 emission requirements for Huhtamaki Foodservice, Inc.), the PM10 emissions related to each facility listed below shall not exceed the following allowable PM10 emission rates:

Emission Unit	EMISSION LIMIT	
	lbs/ton	lb/hr
Molded pulp dryer number 1	0.546	0.210
Molded pulp dryer number 2	0.546	0.250
Molded pulp dryer number 3	0.546	0.290
Molded pulp dryer number 4	0.546	0.290
Molded pulp dryer number 5	0.546	0.130
Molded pulp dryer number 6	0.546	0.130
Molded pulp dryer number 8	0.546	0.350
Molded pulp dryer number 9	0.546	0.410
Molded pulp dryer number 10	0.546	0.350

Note: These PM10 limits are filterable only.

Technical Support Document (TSD) Comments

Comment 1:

Section A.2 (a) of the draft permit [page 5 of 35] should state, much like Section A.2 (b), that two (2) electric laminators follow Molded Pulp Dryer 001 and are considered insignificant activities, to be consistent with Section A.3 (10). Section D.1, Facility Description, should also be modified as above, for consistency.

Response to Comment 1:

IDEM agrees with the recommended changes. The permit has been revised as follows:

The source consists of the following permitted emission units:

- (a) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.

- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively.

There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.

Comment 2:

The values shown in the Table "Unrestricted Potential Emissions" [page 4 of the TSD] do not match the values presented in Appendix A for Potential to Emit for PM10 and PM2.5. The values in Appendix A appear to be correct.

Response to Comment 2:

IDEM agrees with the recommended changes. The table has been revised as follows:

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	65.47 71.56
PM ₁₀	16.37 16.49
PM _{2.5}	16.37 16.49
SO ₂	0.24 0.27
VOC	131.99 146.64
CO	33.73 30.25
NO _x	40.16 45.25
GHGs as CO ₂ e	0 1735
Single HAP	1.58, Methanol 0.03, Hexane
Total HAP	1.72 0.03

The table below is the clean version of the above mentioned table:

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	71.56
PM ₁₀	16.49
PM _{2.5}	16.49
SO ₂	0.27
VOC	146.64
CO	30.25
NO _x	45.25
GHGs as CO ₂ e	1735
Single HAP	0.03, Hexane
Total HAP	0.03

Comment 3:

In the HAP portion of that Table [page 4 of the TSD], the values shown appear to have been copied from the 2012 actual emissions Table [on page 5] and therefore do not reflect the Potential to Emit.

Response to Comment 3:

IDEM agrees with the recommended changes. The table has been revised as follows:

HAPs	tons/year
Acetaldehyde	0.02
Formaldehyde	0.02
Hydrochloric Acid	0.07
Mercury Compounds	0.0000111
Methanol	1.58
Methyl Chloroform	0.004
Toluene	0.03
Total	1.72-0.027

The table below is the clean version of the above mentioned table:

HAPs	tons/year
Total	0.027

Comment 4:

On page 6 of the TSD, the last sentence of the Federal Rule applicability section refers to boiler MACT standards. 40 CFR 63 Part JJJJJJ specifically exempts gas-fired boilers. This sentence should be re-worded.

Response to Comment 4:

Since there are no other boilers besides a gas-fired boiler in the facility, which NESHAP JJJJJJ specifically exempts gas fired boilers, therefore NESHAP JJJJJJ does not apply to this source.

Comment 5:

On page 8 of the TSD, the last paragraph refers to a Sulfuric Acid Regeneration Unit (SARU). Huhtamaki does not operate a SARU. This paragraph should be removed.

Response to Comment 5:

IDEM agrees with the recommended changes.

~~The source conducted a stack test on the Sulfuric Acid Regeneration Unit (SARU) No. 4 on December 5, 2011 and it is complete. The permit requires the test to be repeated every 5 years.~~

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit and the technical support document as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

Change No. 1:

The numbering of the insignificant activities has been corrected:

...

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:

- (1) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs

less than 12,000 gallons.

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

~~(3)~~(2) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

~~(4)~~(3) Machining where an aqueous cutting coolant continuously floods the machining interface.

~~(5)~~(4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

~~(6)~~(5) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

~~(7)~~(6) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

~~(8)~~(7) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

~~(9)~~(8) Other emergency equipment as follows:
Stationary electrically driven fire pumps.

~~(10)~~(9) Two (2) electric laminators following Molded Pulp Dryer No. 4 and two (2) electric laminators following Molded Pulp Dryer No. 1.

...
Change No. 2:

Upon further evaluation, 326 IAC 6.8-1-2 (Particulate emission limitations; modification by commissioner) applies because even though the potential to emit particulate (PM) from the source is less than one hundred (100) tons per year, the actual greater than ten (10) tons per year and are therefore, subject to the PM limitations of 326 IAC 6.8. Condition D.1.2 and D.2.1(b) have been added and the subsequent conditions have been renumbered:

...
Emission Limitations and Standards [326 IAC 2-8-4(1)]

...
D.1.2 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (a)(Particulate Matter Limitations Lake County), particulate matter (PM) emissions from the Molded Pulp Dryers shall be limited to 0.03 grain per dry standard cubic foot of exhaust air each.

...
D.2.1 Particulate Matter less than 10 microns (PM10) and PM [326 IAC 6.8-1-2] [326 IAC 6.8-2-34]

(a) Pursuant to 326 IAC 6.8-2-34 (Lake County PM10 emission requirements), the PM10 emissions from the Babcock and Wilcox Type FM Boiler shall be limited to less than 0.007 lbs/MMBtu and 0.050 lbs/hr.

(b) Pursuant to 326 IAC 6.8-1-2 (a)(Particulate Matter Limitations Lake County), particulate matter (PM) emissions from the Babcock and Wilcox Type FM Boiler shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

...
Change No. 3:

Upon further evaluation, the condition for the Testing condition D.1.4 has been clarified.

...

Compliance Determination Requirements

...

D.1.34 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to determine compliance with Condition D.1.1 **and pursuant to 326 IAC 6.8-4-1(1)**, the Permittee shall perform PM10 testing utilizing Methods 201 or 201A or other methods as approved by the Commissioner on at least one (1) of the largest, most frequently used Molded Pulp Dryers utilizing the worst case chemical additive/dye. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

...

Change No. 4

Condition D.2.3 has been added in Section D.2 to clarify how the source should comply with the PM10 and PM limits specified in Condition D.2.1.

...

Compliance Determination Requirements

D.2.3 Natural Gas

In order to comply with Condition D.2.1, the source shall burn only natural gas.

...

IDEM Contact

- (a) Questions regarding this proposed Part 70 Permit Renewal can be directed to Diya Bhattacharjee 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)234-5372 or toll free at 1-800-451-6027 extension 5372.
- (b) A copy of the permit 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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

PT ID 01: Boiler
 Babcock and Wilcox (Type-FM)

Heat Input Capacity

MMBtu/hr

3.3

HHV

mmBtu

mmBtu

mmBtu

1020

Potential Throughput

MMCF/yr

28.7

MDC (mmBtu/hr): 23

MDR (mmch/hr): 0.0225

HEAT CONTENT (Btu/ct): 1,020

QTY BURNED (mmch/yr): N/A

STACK ID (DIAM:HEIGHT): (3.0: 40)

FLOWRATE (ACFM): 127

Ts(F): 429

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.03	0.1	0.1	0.01	1.4	0.1	1.2

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

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPs Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.019E-05	1.725E-05	1.078E-03	2.587E-02	4.887E-05	2.705E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.187E-06	1.581E-05	2.012E-05	5.462E-06	3.019E-05	7.877E-05
						Total HAPs 2.713E-02
						Worst HAP 2.587E-02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,725	0.03	0.03
Summed Potential Emissions in tons/yr	1,725		
CO2e Total in tons/yr	1,735		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission

CNTRL DEV: NONE

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 1
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.58: 48)
 FLOWRATE (ACFM): 8,227
 Ts(°F): 242

SCC NO. 3-07-004-02		8760 hr/yr			
Potential to Emit					
BEFORE CONTROLS					
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)
PM	2.184	0	1.1627	27.9038	5.0924
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731
SOx	0	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000
VOC	4.435	0	2.3610	56.6648	10.3413
CO	0.02	0	0.0106	0.2555	0.0466
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009
HCl	0.007	0	0.0037	0.0894	0.0163
LEAD	0	0	0.0000	0.0000	0.0000

The following emission factors apply to each of the Molded Pulp Dryers No. 1 - 6 & 8 - 10:
 EF for PM10 - 326 IAC 6.8-2-34
 EF for PM10 is 25% of PM
 EF for VOC from the August 30, 2006 stack test on Molded Pulp Dryer No. 10 (includes both condensable and filterable).
 EF for CO from August 2006 stack test at a similar plant in Waterville, ME.

Fuel Combustion

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cct): 1020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.58: 48)
 FLOWRATE (ACFM): 8,227
 Ts(°F): 242

CNTRL DEV: NONE

SCC NO. 3-90-006-99		8760 hr/yr			
Potential to Emit					
BEFORE CONTROLS					
POLLUTANT	EF(lbs/mmct)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)
PM	0	0	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000
SOx	0.6	0	0.0032	0.0767	0.0140
NOx	100	0	0.5324	12.7765	2.3317
VOC	0	0	0.0000	0.0000	0.0000
CO	84	0	0.4472	10.7322	1.9586
LEAD	0.0005	0	0.0000	0.0001	0.0000

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	44	1.76		3100	250
2	50	1.47		2500	290
3	49	1.51		3200	185
Average (*Flowrate: sum)	48	1.58	23.0	8227	242

Totals for: Molded Pulp Dryer No. 1

POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	0.0000	0.0000	0.0000	1.1627	5.0924
PM10/PM2.5	0.2907	6.9760	1.2731	0.0000	0.0000	0.0000	0.2100	0.9198
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0032	0.0140
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	0.5324	2.3317
VOC	2.3610	56.6648	10.3413	0.0000	0.0000	N/A	2.3610	10.3413
CO	0.4578	10.9878	2.0053	0.4472	1.9586	N/A	0.4578	2.0053
M. Chloroform	0.0002	0.0047	0.0009	0.0000	0.0000	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0000	0.0000	0.0000	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 2
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.70: 46)
 FLOWRATE (ACFM): 8800
 Ts(F): 242

POLLUTANT	SCC NO. 3-07-004-02	EF(LBS/T)	CE (%)	8760 hr/yr Potential to Emit			BEFORE CONTROLS			AFTER CONTROLS		
				(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsdscf)	(lbs/hr)	(TPY)	(grdsdscf)
				PM	0.000	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0000
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	0.2500	1.0950	0.0000	0.2500	1.0950	0.0000	
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	N/A	
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	N/A	
VOC	0.000	0	2.7828	66.7872	12.1887	2.3610	10.3413	N/A	2.3610	10.3413	N/A	
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A	0.0106	0.0466	N/A	
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0002	0.0009	N/A	
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0037	0.0163	N/A	
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	N/A	

PM PTE before control and after control were made equal to the limited allowable PTE
 VOC PTE before control and after control were made equal to the limited allowable PTE

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.70: 46)
 FLOWRATE (ACFM): 8800
 Ts(F): 242

POLLUTANT	SCC NO. 3-90-006-99	EF(lbs/mmct)	CE (%)	8760 hr/yr Potential to Emit			BEFORE CONTROLS			AFTER CONTROLS		
				(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsdscf)	(lbs/hr)	(TPY)	(grdsdscf)
				PM	0	0	0.0000	0.00	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.00	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
SOx	0.6	0	0.0032	0.08	0.0140	0.0032	0.0140	N/A	0.0032	0.0140	N/A	
NOx	100	0	0.6275	15.08	2.7482	0.5324	2.3317	N/A	0.5324	2.3317	N/A	
VOC	0	0	0.0000	0.00	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	N/A	
CO	84	0	0.4472	10.73	1.9586	0.4472	1.9586	N/A	0.4472	1.9586	N/A	
LEAD	0.0005	0	0.0000	0.00	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	N/A	

NOx PTE before control and after control were made equal to the limited allowable PTE

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.76		3100	250
2	48	1.25		2500	290
3	44	2.10		3200	185
Average (*Flowrate: sum)	46	1.70	23.0	8800	242

Totals for: Molded Pulp Dryer No. 2

POLLUTANT	Potential to Emit						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsdscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0204	1.3704	6.0021
PM10/PM2.5	0.2907	6.9760	1.2731	0.2500	1.0950	0.0044	0.2500	1.0950
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0038	0.0165
NOx	0.6275	15.0888	2.7482	0.5324	2.3317	N/A	0.6275	2.7482
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.7828	12.1887
CO	0.5396	12.9508	2.3635	0.4578	2.0053	N/A	0.5396	2.3635
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

CO PTE before control and after control were made equal to the limited allowable PTE

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 3
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(F): 242

SCC NO. 3-07-004-02		8760 hr/yr						
		Potential to Emit						
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241
PM10/PM2.5	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmch/yr): 0.0063

HEAT CONTENT (Btu/cft): 1.020
 QTY BURNED (mmch/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(F): 242

SCC NO. 3-90-006-99		8760 hr/yr						
		Potential to Emit						
POLLUTANT	EF(lbs/mmch)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0038	0.0904	0.0165	0.0038	0.0165	N/A
NOx	100	0	0.6275	15.0588	2.7482	0.6275	2.7482	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5271	12.6494	2.3085	0.5271	2.3085	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (F)		
1	45	1.75	3100	250		
2	50	1.47	2500	290		
3	48	2.17	3200	185		
Average (*Flowrate: sum)		48	1.80	23.0	8800	242

Totals for: Molded Pulp Dryer No. 3

POLLUTANT	Potential to Emit						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241	1.3704	6.0021
PM10/PM2.5	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060	0.2900	1.2702
SOx	0.0038	0.0904	0.0165	0.0038	0.0165	N/A	0.0038	0.0165
NOx	0.6275	15.0588	2.7482	0.6275	2.7482	N/A	0.6275	2.7482
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.7828	12.1887
CO	0.5396	12.9506	2.3635	0.5396	2.3635	N/A	0.5396	2.3635
M. Chloroform	0.0002	0.0056	0.0010	0.0002	0.0010	N/A	0.0002	0.0010
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0044	0.0192
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

CO PTE before control and after control were made equal to the limited allowable PTE

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 4
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(F): 255

SCC NO. 3-07-004-02			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245
PM10/PM2.5	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.2115
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmch/yr): 0.0063

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmch/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(F): 255

SCC NO. 3-90-006-99			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(lbs/mmch)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0038	0.0904	0.0165	0.0038	0.0165	N/A
NOx	100	0	0.6275	15.0588	2.7482	0.6275	2.7482	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5271	12.6494	2.3085	0.5271	2.3085	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (F)		
1	45	1.75	3100	290		
2	50	1.47	2500	290		
3	48	2.17	3200	185		
Average (*Flowrate: sum)		48	1.80	23.0	8800	255

Totals for: Molded Pulp Dryer No. 4								
POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245	1.1627	5.0924
PM10/PM2.5	0.3426	8.2221	1.5005	0.3426	1.5005	0.2115	0.2900	1.2702
SOx	0.0038	0.0904	0.0165	0.0038	0.0165	N/A	0.0032	0.0140
NOx	0.6275	15.0588	2.7482	0.6275	2.7482	N/A	0.5324	2.3317
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.3610	10.3413
CO	0.5396	12.9506	2.3635	0.5396	2.3635	N/A	0.4578	2.0053
M. Chloroform	0.0002	0.0056	0.0010	0.0002	0.0010	N/A	0.0002	0.0009
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0037	0.0163
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 5
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1:80:47)
 FLOWRATE (ACFM): 9100
 Ts(F): 217

SCC NO. 3-07-004-02			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grds/cf)
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0208
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0052
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion MDC (mmBtu/hr): 5.43 HEAT CONTENT (Btu/cf): 1020
 MDR (mmch/hr): 0.0053 QTY BURNED (mmch/yr): N/A
 CNTRL DEV: NONE

STACK ID (DIAM:HEIGHT): (1:80:47)
 FLOWRATE (ACFM): 9100
 Ts(F): 217

SCC NO. 3-90-006-99			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(lbs/mmch)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grds/cf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0032	0.0767	0.0140	0.0032	0.0140	N/A
NOx	100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (F)		
1	44	1.75	3100	235		
2	51	1.47	3000	235		
3	45	2.17	3000	180		
Average (*Flowrate: sum)		47	1.80	23.0	9100	217

Totals for: Molded Pulp Dryer No. 5								
POLLUTANT	Potential to Emit			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grds/cf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0208	1.1627	5.0924
PM10/PM2.5	0.2907	6.9760	1.2731	0.2907	1.2731	0.0052	0.1300	0.5694
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0032	0.0140
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	0.5324	2.3317
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4578	10.9878	2.0053	0.4578	2.0053	N/A	0.4578	2.0053
M. Chloroform	0.0002	0.0048	0.0009	0.0002	0.0009	N/A	0.0002	0.0009
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0037	0.0163
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 6
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (2:22: 52)
 FLOWRATE (ACFM): 9100
 Ts(F): 217

SCC NO. 3-07-004-02		8760 hr/yr Potential to Emit						
POLLUTANT	EF(LBS/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsct)
PM	0.000	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0000
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0000
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	0.000	0	5.0003	120.0053	21.9013	2.3610	10.3413	N/A
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
M. Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

PM PTE before control and after control were made equal to the limited allowable PTE
 VOC PTE before control and after control were made equal to the limited allowable PTE

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (2:22: 52)
 FLOWRATE (ACFM): 9100
 Ts(F): 217

SCC NO. 3-90-006-99		8760 hr/yr Potential to Emit						
POLLUTANT	EF(lbs/mmct)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsct)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0068	0.1624	0.0296	0.0032	0.0140	N/A
NOx	100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

SOx PTE before control and after control were made equal to the limited allowable PTE

Production Capacity

792,141 dry-lbs/month

(3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	58	2.34		3100	235
2	50	2.05		3000	235
3	49	2.26		3000	180
Average (*Flowrate: sum)	52	2.22	23.0	9100	217

Totals for: Molded Pulp Dryer No. 6

POLLUTANT	8760 hr/yr Potential to Emit						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(grdsct)		
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0000	2.4624	10.7851
PM10/PM2.5	0.2907	6.9760	1.2731	0.2907	1.2731	0.0000	0.1300	0.5694
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0068	0.0296
NOx	1.1275	27.0588	4.9382	0.5324	2.3317	N/A	1.1275	4.9382
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	5.0003	21.9015
CO	0.9696	23.2706	4.2469	0.4578	2.0053	N/A	0.9696	4.2469
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

CO PTE before control and after control were made equal to the limited allowable PTE

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 8
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-09-006-99			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(LB/MT)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 11.5
 MDR (mmch/yr): 0.0113

HEAT CONTENT (Btu/cft): 1.020
 QTY BURNED (mmch/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-90-006-99			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(lbs/mmch)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0068	0.1624	0.0296	0.0068	0.0296	N/A
NOx	100	0	1.1275	27.0588	4.9382	1.1275	4.9382	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.9471	22.7294	4.1481	0.9471	4.1481	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (F)		
1	46	1.91	2600	230		
2	50	1.72	2300	340		
3	50	1.71	3700	180		
4	48	1.92	15000	180		
Average (*Flowrate: sum)		49	1.82	23.0	23600	233

Totals for: Molded Pulp Dryer No. 8

POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10/PM2.5	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0.0068	0.1624	0.0296	0.0068	0.0296	N/A	0.0068	0.0296
NOx	1.1275	27.0588	4.9382	1.1275	4.9382	N/A	1.1275	4.9382
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	0.9696	23.2706	4.2469	0.9696	4.2469	N/A	0.9696	4.2469
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0004	0.0018
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

PM10: 326 IAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 9
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-07-004-02			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 11.5
 MDR (mmct/hr): 0.0113

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-90-006-99			8760 hr/yr					
			Potential to Emit					
POLLUTANT	EF(lbs/mmct)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0144	0.3456	0.0631	0.0068	0.0296	N/A
NOx	100	0	1.1275	27.0588	4.9382	1.1275	4.9382	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.9471	22.7294	4.1481	0.9471	4.1481	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

SOx PTE before control and after control were made equal to the limited allowable PTE

Production Capacity

1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)		
1	46	1.92	2600	230		
2	51	1.72	2300	340		
3	50	1.71	3700	180		
4	50	2.57	15000	180		
Average (*Flowrate: sum)		49	1.98	23.0	23600	233

Totals for: Molded Pulp Dryer No. 9

POLLUTANT	Potential to Emit			ALLOWABLE		
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	
PM	2.4624	59.0965	10.7851	2.4624	10.7851	
PM10/PM2.5	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0.0068	0.1624	0.0296	0.0068	0.0296	N/A
NOx	2.4000	57.6000	10.5120	1.1275	4.9382	N/A
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	1.0305	24.7332	4.5138	0.9696	4.2469	N/A
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

NOx PTE before control and after control were made equal to the limited allowable PTE

CO PTE before control and after control were made equal to the limited allowable PTE

PM10: 326 iAC 6.8-2-34

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 10
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-07-004-02			8760 hr/yr							
			Potential to Emit			AFTER CONTROLS			ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lb/hr)	(TPY)
			(lb/hr)	(lb/day)	(TPY)	(lb/hr)	(TPY)	(gr/dscf)		
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A	0.0383	0.1677
NOx	0	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A	0.0225	0.0988
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0004	0.0018
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0079	0.0346
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Fuel Combustion MDC (mmBtu/hr): 11.5 HEAT CONTENT (Btu/cft): 1020
 MDR (mmch/hr): 0.0120 QTY BURNED (mmch/yr): N/A
 CNTRL DEV: NONE

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(F): 232

SCC NO. 3-90-006-99			8760 hr/yr							
			Potential to Emit			AFTER CONTROLS			ALLOWABLE	
POLLUTANT	EF(lbs/mmch)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lb/hr)	(TPY)
			(lb/hr)	(lb/day)	(TPY)	(lb/hr)	(TPY)	(gr/dscf)		
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0144	0.3456	0.0631	0.0072	0.0315	N/A	0.0383	0.1677
NOx	100	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
CO	84	0	1.0080	24.1920	4.4150	1.0080	4.4150	N/A	1.0080	4.4150
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

SOx PTE before control and after control were made equal to the limited allowable PTE

Production Capacity 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (F)		
1	46	1.92	2600	230		
2	50	1.71	2300	340		
3	50	1.71	3700	180		
4	48	1.92	15000	180		
Average (*Flowrate: sum)		49	1.82	23.0	23600	233

Totals for: Molded Pulp Dryer No. 10

SCC NO. 3-07-004-02			8760 hr/yr							
			Potential to Emit			AFTER CONTROLS			ALLOWABLE	
POLLUTANT	(lb/hr)	(lb/day)	BEFORE CONTROLS			AFTER CONTROLS			(lb/hr)	(TPY)
			(lb/hr)	(lb/day)	(TPY)	(lb/hr)	(TPY)	(gr/dscf)		
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851		
PM10/PM2.5	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330		
SOx	0.0144	0.3456	0.0631	0.0144	0.0631	N/A	0.0383	0.1677		
NOx	2.4000	57.6000	10.5120	2.4000	10.5120	N/A	2.4000	10.5120		
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015		
CO	1.0305	24.7332	4.5138	1.0305	4.5138	N/A	1.0305	4.5138		
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0004	0.0018		
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0079	0.0346		
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000		

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
Address: 6629 Indianapolis Blvd, Hammond, IN 46320
TVOP: T089-33556-00228
Reviewer: Diya Bhattacharjee

Cold Cleaner Degreaser

Solvent Used: Safety-Kleen Premium Gold Solvent

MDR (gal solvent/hr): 0.01
 YEARLY USAGE (gal solvent/yr): 70

CNTRL DEV: None

SCC NO. 4-02-002-10			8760 hr/yr Potential to Emit					
POLLUTANT	EF (lbs VOC/gal coating)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	6.46	0	0.0516	1.2389	0.2261	0.0516	0.2261	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

VOC EF: Solvent density = 6.46 lbs/gal, 100% organic volatiles

Insignificant Activity: VOC emissions less than 3 lbs/hr or 15 lbs/day (326 IAC 2-7-1(21)).

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:	Huhtamaki, Inc.
Source Location:	6629 Indianapolis Blvd, Hammond, IN 46320
County:	Lake
SIC Code:	2679
Permit Renewal No.:	T089-33556-00228
Permit Reviewer:	Diya Bhattacharjee

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Huhtamaki, Inc. relating to the operation of a stationary manufacturer of molded pulp paper products. On August 21, 2013, Huhtamaki, Inc. submitted an application to the OAQ requesting to renew its operating permit. Huhtamaki, Inc. was issued its first Part 70 Operating Permit Renewal T089-18532-00228 on May 27, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Four (4) Molded Pulp Dryers, identified as 001, 002, 005 and 006, each with a maximum heat input capacity of 5.43 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks, identified as Stacks 1A, 1B & 1C, Stacks 2A, 2B & 2C, Stacks 5A, 5B & 5C and Stacks 6A, 6B & 6C, respectively. There are also two (2) electric laminators following Molded Pulp Dryer No.1 that are considered insignificant activities.
- (b) Two (2) Molded Pulp Dryers identified as 003 and 004, each with a maximum heat input capacity of 6.4 MMBtu/hr, using no controls, each constructed on 1947, and exhausting to stacks identified as Stacks 3A, 3B & 3C and Stacks 4A, 4B & 4C, respectively. There are also two (2) electric laminators following Molded Pulp Dryer No. 4 that are considered insignificant activities.
- (c) Three (3) Molded Pulp Dryers identified as 008, 009 and 010, each with a maximum heat input capacity of 11.50 MMBtu/hr, each constructed on 1947, and exhausting to stacks identified as Stacks 8A, 8B, 8C & 8D, Stacks 9A, 9B, 9C & 9D and Stacks 10A, 10B, 10C & 10D, respectively.
- (d) One (1) Babcock and Wilcox Type FM Boiler, identified as Unit 011, with a maximum design capacity of 23 MMBtu/hr, constructed in 1947, using no controls, and exhausting to Stack 11.

Insignificant Activities

The source also consists of the following insignificant activities:

- (1) Space heaters, process heaters, or boilers using the following fuels:
 - (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (2) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (4) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326IAC 20-6.
- (6) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (7) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (8) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (9) Other emergency equipment as follows:
Stationary electrically driven fire pumps.
- (10) Two (2) electric laminators following Molded Pulp Dryer No. 4 and two (2) electric laminators following Molded Pulp Dryer No. 1.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 089 - 18532 - 00228 on May 27, 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 Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard.
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
Unclassifiable or attainment effective February 6, 2012, for PM _{2.5} .	

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. 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. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (b) **PM_{2.5}**
 Lake County has been classified as attainment for PM_{2.5}. 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**
 Lake County has been classified as attainment or unclassifiable in Indiana for CO, PM₁₀, NO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	65.67
PM ₁₀	10.98
PM _{2.5}	10.98
SO ₂	0.23
VOC	132.33
CO	34.75
NO _x	40.18
GHGs as CO ₂ e	13
Single HAP	Negligible
Total HAP	Negligible

HAPs	Tons/year
Total HAPs	Negligible

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 VOC is 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.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2012 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	3
PM ₁₀	3
SO ₂	0
VOC	51
CO	12
NO _x	14

Pollutant	Actual Emissions (tons/year)
Acetaldehyde	0.02
Formaldehyde	0.02
Hydrochloric Acid	0.07
Mercury Compounds	0.0000111
Methanol	1.58
Methyl Chloroform	0.004
Toluene	0.03
TOTAL	1.72

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

Process/emission unit	Potential To Emit (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	GHGs as CO ₂ e	HAPs
Molded Pulp Dryer No. 1	5.09	0.92	0.92	0.01	10.34	1.98	2.30	0	Negligible
Molded Pulp Dryer No. 2	5.09	1.1	1.1	0.01	10.34	1.98	2.30	0	Negligible
Molded Pulp Dryer No. 3	6.00	1.27	1.27	0.02	12.19	2.33	2.71	0	Negligible
Molded Pulp Dryer No. 4	6.00	1.27	1.27	0.02	12.19	2.33	2.71	0	Negligible
Molded Pulp Dryer No. 5	5.09	0.57	0.57	0.01	10.34	1.98	2.30	0	Negligible
Molded Pulp Dryer No. 6	5.09	0.57	0.57	0.01	10.34	1.98	2.30	0	Negligible
Molded Pulp Dryer No. 8	10.79	1.53	1.53	0.03	21.90	4.51	5.26	0	Negligible
Molded Pulp Dryer No. 9	10.79	1.8	1.8	0.03	21.90	4.51	5.26	0	Negligible
Molded Pulp Dryer No. 10	10.79	1.53	1.53	0.03	21.90	4.51	5.26	0	Negligible
Babcock & Wilcox Boiler	0.74	0.22	0.22	0.06	0.54	8.22	9.78	13	Negligible
Laminators	0.1995	0.1995	0.1995	0	0.1235	0.417	0	0	Negligible
Cold Cleaner Degreasers	0	0	0	0	0.2261	0	0	0	Negligible
Total	65.67	10.98	10.98	0.23	132.33	34.75	40.18	13	Negligible
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	NA	250	NA	100,000 CO ₂ e	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	NA	100	NA	NA

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year,
- (b) The emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, therefore, it is not subject to the regulation.
- (c) This existing stationary source is major for Nonattainment NSR because the emissions of VOC is greater than 100 tons 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 because VOC is not controlled and all other pollutant and HAPs PTE is less than the Part 70 threshold..

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

The requirements of the New Source Performance Standard, 326 IAC 12 Part 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for the Babcock & Wilcox Boiler. Construction of this unit commenced in 1947 and since then it has not been modified or reconstructed.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 61, 40 CFR Part 63) included in the permit for this source.

The requirements of the National Emission Standards, 326 IAC 20 and 40 CFR Part 63.440, Subpart S (National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry) do not apply to this source because it is not a major source of HAPs as defined in Subpart 63.2 of the subpart A of this part.

Area source for boiler MACT for gas-fired boiler 40 CFR 63, Part JJJJJJ does not apply because there is a gas fired boiler.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 6, 1998. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on July 22, 1988. This ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source, built in 1947, located in Lake County is not a major stationary source for the purposes of 326 IAC 2-2, PSD because the emissions of each PSD regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the 28 listed source categories.

326 IAC 2-3 (Nonattainment NSR)

This source, built in 1947, located in Lake County is an existing major stationary source for the purposes of 326 IAC 2-3, Emission Offset because the emissions of VOC, are greater than one hundred (>100) tons per year. Therefore, the source is not a major source under Nonattainment NSR for ozone.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Lake County and its emissions of VOC and NOx are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2014 and every year thereafter. 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(2)

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to section 2(a) of this rule, this source is subject to the requirements of this rule because it has the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy) and is located in Lake County.

Huhtamaki, Inc. and IDEM have determined in permit # 089-9029-00228, issued on December 1, 1999, that it is not technically or economically feasible to install control technology for VOC emissions from these secondary fiber paper machines. The high volumetric flow rates coupled with the fact that the air stream has a very high moisture content, make it not practical and unrealistic to consider a VOC emission capture and control system. U.S. EPA has also determined that Maximum Achievable Control Technology for paper machines is "no add-on controls." As far as a reduction in the use of VOC containing materials, U.S. EPA continues to investigate the viability of chemical substitution that would reduce emissions. Paper products used with food items are subject to FDA requirements which hinder substitution of certain compounds. Over the past five years, Huhtamaki, Inc. has eliminated half of the additives and dyes that it previously used. The Company remains open to suggestions on any substitutions that can be made for VOC-containing additives and dyes which will not be in violation of the requirements of the final product.

State Rule Applicability – Individual Facilities

326 IAC 6.8-2-34 (Lake County PM10 emission requirements – Huhtamaki, Inc.)

This rule requires that the following facilities located at Huhtamaki, Inc. comply with the corresponding PM10 emission limitations as specifically listed in 326 IAC 6.8-2-34 under Huhtamaki, Inc.

FACILITY	PM10 EMISSION LIMITATIONS
Molded Pulp Dryer No. 1	0.546 lbs/ton; 0.210 lb/hr
Molded Pulp Dryer No. 2	0.546 lbs/ton; 0.250 lb/hr
Molded Pulp Dryer No. 3	0.546 lbs/ton; 0.290 lb/hr
Molded Pulp Dryer No. 4	0.546 lbs/ton; 0.290 lb/hr
Molded Pulp Dryer No. 5	0.546 lbs/ton; 0.130 lb/hr
Molded Pulp Dryer No. 6	0.546 lbs/ton; 0.130 lb/hr
Molded Pulp Dryer No. 8	0.546 lbs/ton; 0.350 lb/hr
Molded Pulp Dryer No. 9	0.546 lbs/ton; 0.410 lb/hr
Molded Pulp Dryer No. 10	0.546 lbs/ton; 0.350 lb/hr
Babcock and Wilcox Boiler	0.007 lbs/MMBtu; 0.050 lb/hr

326 IAC 7-1.1-1 (Applicability - sulfur dioxide emission limitations)

All emissions units associated with the Molded Pulp Paper Manufacturing Plant have the potential to emit less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7-1.1-1 Lake County sulfur dioxide emission limitations do not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The Cold Cleaner Degreaser without remote solvent reservoirs is subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because it is located in Lake County, existed as of January 1, 1980, and is located at a source that has potential emissions of one hundred (100) tons or greater per year of VOC.

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.

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 August 21, 2013.

Conclusion

The operation of this stationary manufacturer of molded pulp paper products shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-33556-00228.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Diya Bhattacharjee 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)234-5372 or toll free at 1-800-451-6027 extension 5372.
- (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: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
Address: 6629 Indianapolis Blvd, Hammond, IN 46320
TVOP: T089-33556-00228
Reviewer: Diya Bhattacharjee

PT ID 01: Boiler
Babcock and Wilcox (Type-FM)
 Heat Input Capacity
 MMBtu/hr

HHV
 mMBtu
 mmscf

Potential Throughput
 MMCF/yr

MDC (mmBtu/hr): 23
 MDR (mmctf/hr): 0.0225

HEAT CONTENT (Btu/cf): 1,020
 QTY BURNED (mmctf/yr): N/A

STACK ID (DIAM:HEIGHT): (3.0: 40)
 FLOWRATE (ACFM): 127
 Ts("F): 429

3.3

1020

28.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	1.4	0.1	1.2

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

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	2.310E-07	1.320E-07	8.250E-06	1.980E-04	3.740E-07	2.070E-04

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	5.500E-08	1.210E-07	1.540E-07	4.180E-08	2.310E-07	6.028E-07
	Total HAPs					2.076E-04
	Worst HAP					2.100E-03

Methodology is the same as above.

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

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	13	0.0	0.0
Summed Potential Emissions in tons/yr	13		
CO2e Total in tons/yr	13		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission
 CNTRL DEV: NONE

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
Address: 6629 Indianapolis Blvd, Hammond, IN 46320
TVOP: T089-33556-00228
Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 1
(Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.58: 48)
 FLOWRATE (ACFM): 8,227
 Ts(°F): 242

POLLUTANT	SCC NO. 3-07-004-02	EF(LB/T)	CE (%)	8760 hr/yr POTENTIAL EMISSIONS		
				BEFORE CONTROLS		
				(lbs/hr)	(lbs/day)	(TPY)
PM	2.184	0	1.1627	27.9038	5.0924	
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	
SOx	0	0	0.0000	0.0000	0.0000	
NOx	0	0	0.0000	0.0000	0.0000	
VOC	4.435	0	2.3610	56.6648	10.3413	
CO	0.02	0	0.0106	0.2555	0.0466	
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	
HCl	0.0037	0	0.0037	0.0894	0.0163	
LEAD	0	0	0.0000	0.0000	0.0000	

The following emission factors apply to each of the Molded Pulp Dryers No. 1 - 6 & 8 - 10:
 EF for PM10 - 326 IAC 6.8-2-34

EF for PM10 is 25% of PM
 EF for VOC from the August 30, 2006 stack test on Molded Pulp Dryer No. 10 (includes both condensable and filterable).
 EF for CO from August 2006 stack test at a similar plant in Waterville, ME.

Fuel Combustion

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cft): 1020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.58: 48)
 FLOWRATE (ACFM): 8,227
 Ts(°F): 242

CNTRL DEV: NONE

POLLUTANT	SCC NO. 3-90-006-99	EF(lbs/mmct)	CE (%)	8760 hr/yr POTENTIAL EMISSIONS			AFTER CONTROLS		
				BEFORE CONTROLS			(lbs/hr)	(TPY)	(gr/dscf)
				(lbs/hr)	(lbs/day)	(TPY)			
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
SOx	0.6	0	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	
NOx	100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	
CO	84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A	
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	44	1.76		3100	250
2	50	1.47		2500	290
3	49	1.51		3200	185
Average (*Flowrate: sum)	48	1.58	23.0	8227	242

Totals for: Molded Pulp Dryer No. 1

POLLUTANT	POTENTIAL EMISSIONS			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	0.0000	0.0000	0.0000	1.1627	5.0924
PM10/PM2.5	0.2907	6.9760	1.2731	0.0000	0.0000	0.0000	0.2100	0.9198
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0032	0.0140
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	0.5324	2.3317
VOC	2.3610	56.6648	10.3413	0.0000	0.0000	N/A	2.3610	10.3413
CO	0.4578	10.9878	2.0053	0.4472	1.9586	N/A	0.4578	2.0053
M. Chloroform	0.0002	0.0047	0.0009	0.0000	0.0000	0.0000	0.0000	0.0000
HCl	0.0037	0.0894	0.0163	0.0000	0.0000	0.0000	0.0000	0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 2
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.70: 46)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

SCC NO. 3-07-004-02		8760 hr/yr POTENTIAL EMISSIONS								
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			TPY	AFTER CONTROLS			
			(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)	
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0204		
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	0.2500	1.0950	0.0044		
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A		
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A		
Methyl Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A		
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A		
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

STACK ID (DIAM:HEIGHT): (1.70: 46)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

SCC NO. 3-90-006-99		8760 hr/yr POTENTIAL EMISSIONS								
POLLUTANT	EF(lbs/mmct)	CE (%)	BEFORE CONTROLS			TPY	AFTER CONTROLS			
			(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)	
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
SOx	0.6	0	0.0032	0.0767	0.0140	0.0032	0.0140	N/A		
NOx	100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A		
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		
CO	84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A		
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A		

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.76		3100	250
2	48	1.25		2500	290
3	44	2.10		3200	185
Average (Flowrate: sum)	46	1.70	23.0	8800	242

Totals for: Molded Pulp Dryer No. 2									
POLLUTANT	BEFORE CONTROLS			TPY	AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0204	1.3704	6.0021	
PM10/PM2.5	0.2907	6.9760	1.2731	0.2500	1.0950	0.0044	0.2500	1.0950	
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0038	0.0165	
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	0.6275	2.7482	
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.7628	12.1887	
CO	0.4578	10.9878	2.0053	0.4578	2.0053	N/A	0.5396	2.3635	
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000	
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000	
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacherjee

Molded Pulp Dryer No. 3
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

SCC NO. 3-07-004-02		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241
PM10/PM2.5	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 242

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmct/hr): 0.0063

SCC NO. 3-90-006-99		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(lbs/mmctf)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0038	0.0904	0.0165	0.0038	0.0165	N/A
NOx	100	0	0.6275	15.0588	2.7482	0.6275	2.7482	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5271	12.6494	2.3085	0.5271	2.3085	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.75		3100	250
2	50	1.47		2500	290
3	48	2.17		3200	185
Average (*Flowrate: sum)	48	1.80	23.0	8800	242

Totals for: Molded Pulp Dryer No. 3

POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0241	1.3704	6.0021
PM10/PM2.5	0.3426	8.2221	1.5005	0.3426	1.5005	0.0060	0.2900	1.2702
SOx	0.0038	0.0904	0.0165	0.0038	0.0165	N/A	0.0038	0.0165
NOx	0.6275	15.0588	2.7482	0.6275	2.7482	N/A	0.6275	2.7482
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.7828	12.1887
CO	0.5396	12.9506	2.3635	0.5396	2.3635	N/A	0.5396	2.3635
M. Chloroform	0.00032	0.0056	0.0010	0.0002	0.0010	N/A	0.0002	0.0010
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0044	0.0192
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacherjee

Molded Pulp Dryer No. 4
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.627
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 255

SCC NO. 3-07-004-02		8760 hr/yr POTENTIAL EMISSIONS						
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	2.184	0	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245
PM10/PM2.5	0.546	0	0.3426	8.2221	1.5005	0.3426	1.5005	0.2115
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	2.7828	66.7872	12.1887	2.7828	12.1887	N/A
CO	0.02	0	0.0125	0.3012	0.0550	0.0125	0.0550	N/A
Methyl Chloroform	0.00037	0	0.0002	0.0056	0.0010	0.0002	0.0010	N/A
HCl	0.007	0	0.0044	0.1054	0.0192	0.0044	0.0192	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 6.4
 MDR (mmct/hr): 0.0063

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.80: 48)
 FLOWRATE (ACFM): 8800
 Ts(°F): 255

SCC NO. 3-90-006-99		8760 hr/yr POTENTIAL EMISSIONS						
POLLUTANT	EF(lbs/mmctf)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0038	0.0904	0.0165	0.0038	0.0165	N/A
NOx	100	0	0.6275	15.0588	2.7482	0.6275	2.7482	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.5271	12.6494	2.3085	0.5271	2.3085	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 933,647 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	45	1.75		3100	290
2	50	1.47		2500	290
3	48	2.17		3200	185
Average (*Flowrate: sum)	48	1.80	23.0	8800	255

Totals for: Molded Pulp Dryer No. 4									
POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE		
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)	
PM	1.3704	32.8885	6.0021	1.3704	6.0021	0.0245	1.1627	5.0924	
PM10/PM2.5	0.3426	8.2221	1.5005	0.3426	1.5005	0.2115	0.2900	1.2702	
SOx	0.0038	0.0904	0.0165	0.0038	0.0165	N/A	0.0032	0.0140	
NOx	0.6275	15.0588	2.7482	0.6275	2.7482	N/A	0.5324	2.3317	
VOC	2.7828	66.7872	12.1887	2.7828	12.1887	N/A	2.3610	10.3413	
CO	0.5396	12.9506	2.3635	0.5396	2.3635	N/A	0.4578	2.0053	
M. Chloroform	0.00032	0.0056	0.0010	0.0002	0.0010	N/A	0.0002	0.0009	
HCl	0.0044	0.1054	0.0192	0.0044	0.0192	N/A	0.0037	0.0163	
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacherjee

Molded Pulp Dryer No. 5
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1:80:47)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

8760 hr/yr									
POTENTIAL EMISSIONS									
POLLUTANT	SCC NO. 3-07-004-02	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
				(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM		2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0208
PM10/PM2.5		0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0052
SOx		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC		4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A
CO		0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A
Methyl Chloroform		0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A
HCl		0.0037	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A
LEAD		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cft): 1020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1:80:47)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

8760 hr/yr									
POTENTIAL EMISSIONS									
POLLUTANT	SCC NO. 3-90-006-99	EF(lbs/mmct)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
				(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx		0.6	0	0.0032	0.0767	0.0140	0.0032	0.0140	N/A
NOx		100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A
VOC		0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO		84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A
LEAD		0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	44	1.75		3100	235
2	51	1.47		3000	235
3	45	2.17		3000	180
Average (*Flowrate: sum)	47	1.80	23.0	9100	217

Totals for: Molded Pulp Dryer No. 5

POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)		
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0208	1.1627	5.0924
PM10/PM2.5	0.2907	6.9760	1.2731	0.2907	1.2731	0.0052	0.1300	0.5694
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0032	0.0140
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	0.5324	2.3317
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	2.3610	10.3413
CO	0.4578	10.9878	2.0053	0.4578	2.0053	N/A	0.4578	2.0053
M. Chloroform	0.00032	0.0048	0.0009	0.00032	0.0009	N/A	0.00032	0.0009
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0037	0.0163
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 6
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 0.532
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (2:22: 52)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

SCC NO. 3-07-004-02		8760 hr/yr POTENTIAL EMISSIONS									
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			TPY	AFTER CONTROLS			(gr/dscf)	
			(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)		
PM	2.184	0	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190			
PM10/PM2.5	0.546	0	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048			
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			
VOC	4.435	0	2.3610	56.6648	10.3413	2.3610	10.3413	N/A			
CO	0.02	0	0.0106	0.2555	0.0466	0.0106	0.0466	N/A			
M. Chloroform	0.00037	0	0.0002	0.0047	0.0009	0.0002	0.0009	N/A			
HCl	0.007	0	0.0037	0.0894	0.0163	0.0037	0.0163	N/A			
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			

Fuel Combustion

MDC (mmBtu/hr): 5.43
 MDR (mmct/hr): 0.0053

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (2:22: 52)
 FLOWRATE (ACFM): 9100
 Ts(°F): 217

CNTRL DEV: NONE

SCC NO. 3-90-006-99		8760 hr/yr POTENTIAL EMISSIONS									
POLLUTANT	EF(lbs/mmct)	CE (%)	BEFORE CONTROLS			TPY	AFTER CONTROLS			(gr/dscf)	
			(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)		
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
SOx	0.6	0	0.0032	0.0767	0.0140	0.0032	0.0140	N/A			
NOx	100	0	0.5324	12.7765	2.3317	0.5324	2.3317	N/A			
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			
CO	84	0	0.4472	10.7322	1.9586	0.4472	1.9586	N/A			
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A			

Production Capacity 792,141 dry-lbs/month

* (3) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	58	2.34		3100	235
2	50	2.05		3000	235
3	49	2.26		3000	180
Average (Flowrate: sum)	52	2.22	23.0	9100	217

Totals for: Molded Pulp Dryer No. 6									
POLLUTANT	BEFORE CONTROLS			TPY	AFTER CONTROLS			ALLOWABLE	
	(lbs/hr)	(lbs/day)	(TPY)		(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	1.1627	27.9038	5.0924	1.1627	5.0924	0.0190	2.4624	10.7851	
PM10/PM2.5	0.2907	6.9760	1.2731	0.2907	1.2731	0.0048	0.1300	0.5694	
SOx	0.0032	0.0767	0.0140	0.0032	0.0140	N/A	0.0068	0.0296	
NOx	0.5324	12.7765	2.3317	0.5324	2.3317	N/A	1.1275	4.9382	
VOC	2.3610	56.6648	10.3413	2.3610	10.3413	N/A	5.0003	21.9015	
CO	0.4578	10.9878	2.0053	0.4578	2.0053	N/A	0.9696	4.2469	
M. Chloroform	0.0002	0.0047	0.0009	0.0002	0.0009	N/A	0.0000	0.0000	
HCl	0.0037	0.0894	0.0163	0.0037	0.0163	N/A	0.0000	0.0000	
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000	

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacherjee

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

Molded Pulp Dryer No. 8
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

SCC NO. 3-09-006-99		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 11.5
 MDR (mmct/hr): 0.0113

SCC NO. 3-90-006-99		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(lbs/mmctf)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0068	0.1624	0.0296	0.0068	0.0296	N/A
NOx	100	0	1.1275	27.0588	4.9382	1.1275	4.9382	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.9471	22.7294	4.1481	0.9471	4.1481	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.91		2600	230
2	50	1.72		2300	340
3	50	1.71		3700	180
4	48	1.92		15000	180
Average (*Flowrate: sum)	49	1.82	23.0	23600	233

Totals for: Molded Pulp Dryer No. 8

POLLUTANT	POTENTIAL EMISSIONS					ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	
PM	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624 10.7851
PM10/PM2.5	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500 1.5330
SOx	0.0068	0.1624	0.0296	0.0068	0.0296	N/A	0.0068 0.0296
NOx	1.1275	27.0588	4.9382	1.1275	4.9382	N/A	1.1275 4.9382
VOC	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003 21.9015
CO	0.9696	23.2706	4.2469	0.9696	4.2469	N/A	0.9696 4.2469
M. Chloroform	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0004 0.0018
HCl	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000 0.0000
LEAD	0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000 0.0000

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 9
 (Process Emissions)
 CNTRL DEV: None

MDR (T/yr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

SCC NO. 3-07-004-02		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A
HCl	0.007	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Fuel Combustion
 CNTRL DEV: NONE

MDC (mmBtu/hr): 11.5
 MDR (mmct/hr): 0.0113

HEAT CONTENT (Btu/cft): 1,020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.98: 49)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

SCC NO. 3-90-006-99		8760 hr/yr						
		POTENTIAL EMISSIONS						
POLLUTANT	EF(lbs/mmctf)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0068	0.1624	0.0296	0.0068	0.0296	N/A
NOx	100	0	1.1275	27.0588	4.9382	1.1275	4.9382	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	84	0	0.9471	22.7294	4.1481	0.9471	4.1481	N/A
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A

Production Capacity 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.92		2600	230
2	51	1.72		2300	340
3	50	1.71		3700	180
4	50	2.57		15000	180
Average (*Flowrate: sum)	49	1.98	23.0	23600	233

Totals for: Molded Pulp Dryer No. 9									
		POTENTIAL EMISSIONS					ALLOWABLE		
POLLUTANT		BEFORE CONTROLS			AFTER CONTROLS				
		(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)
PM		2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10/PM2.5		0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.4100	1.7958
SOx		0.0068	0.1624	0.0296	0.0068	0.0296	N/A	0.0144	0.0631
NOx		1.1275	27.0588	4.9382	1.1275	4.9382	N/A	2.4000	10.5120
VOC		5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO		0.9696	23.2706	4.2469	0.9696	4.2469	N/A	1.0305	4.5138
M. Chloroform		0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0000	0.0000
HCl		0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0000	0.0000
LEAD		0.0000	0.0001	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Appendix A: Source Emissions Calculations

PM10: 326 IAC 6.8-2-34

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Molded Pulp Dryer No. 10
 (Process Emissions)
 CNTRL DEV: None

MDR (T/hr): 1.127
 YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

SCC NO. 3-07-004-02		8760 hr/yr								
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A	0.0383	0.1677
NOx	0	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A	1.2000	5.2560
VOC	4.435	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A	5.0003	21.9015
CO	0.02	0	0.0225	0.5412	0.0988	0.0225	0.0988	N/A	0.0225	0.0988
Methyl Chloroform	0.00037	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A	0.0004	0.0018
HCl	0.0079	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A	0.0079	0.0346
LEAD	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Fuel Combustion MDC (mmBtu/hr): 11.5
 MDR (mmct/hr): 0.0120

HEAT CONTENT (Btu/ct): 1020
 QTY BURNED (mmct/yr): N/A

STACK ID (DIAM:HEIGHT): (1.82: 48)
 FLOWRATE (ACFM): 23600
 Ts(°F): 232

CNTRL DEV: NONE

SCC NO. 3-90-006-99		8760 hr/yr								
POLLUTANT	EF(lbs/mmctf)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SOx	0.6	0	0.0072	0.1728	0.0315	0.0072	0.0315	N/A		
NOx	100	0	1.2000	28.8000	5.2560	1.2000	5.2560	N/A		
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		
CO	84	0	1.0080	24.1920	4.4150	1.0080	4.4150	N/A		
LEAD	0.0005	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A		

Production Capacity 1,677,647 dry-lbs/month

* (4) Stacks for this Dryer:

	Height (ft)	Diameter (ft)	Velocity (ft/sec)	Flowrate (ACFM)	T (°F)
1	46	1.92		2600	230
2	50	1.71		2300	340
3	50	1.71		3700	180
4	48	1.92		15000	180
Average (*Flowrate: sum)	49	1.82	23.0	23600	233

Totals for: Molded Pulp Dryer No. 10		8760 hr/yr								
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscft)	(lbs/hr)	(TPY)
PM	2.184	0	2.4624	59.0965	10.7851	2.4624	10.7851	0.0159	2.4624	10.7851
PM10/PM2.5	0.546	0	0.6156	14.7741	2.6963	0.6156	2.6963	0.0040	0.3500	1.5330
SOx	0	0	0.0144	0.3456	0.0631	0.0144	0.0631	N/A		
NOx	0	0	2.4000	57.6000	10.5120	2.4000	10.5120	N/A		
VOC	0	0	5.0003	120.0083	21.9015	5.0003	21.9015	N/A		
CO	0	0	1.0305	24.7332	4.5138	1.0305	4.5138	N/A		
M. Chloroform	0	0	0.0004	0.0100	0.0018	0.0004	0.0018	N/A		
HCl	0	0	0.0079	0.1894	0.0346	0.0079	0.0346	N/A		
LEAD	0	0	0.0000	0.0001	0.0000	0.0000	0.0000	N/A		

Appendix A: Source Emissions Calculations

Company Name: Huhtamaki, Inc.
 Address: 6629 Indianapolis Blvd, Hammond, IN 46320
 TVOP: T089-33556-00228
 Reviewer: Diya Bhattacharjee

Cold Cleaner Degreaser

Solvent Used: Safety-Kleen Premium Gold Solvent

MDR (gal solvent/hr): 0.01
 YEARLY USAGE (gal solvent/yr): 70

CNTRL DEV: None

POLLUTANT	EF(lbs VOC/gal coating)	CE (%)	8760 hr/yr					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(qr/dsct)
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
PM10/PM2.5	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	6.46	0	0.0516	1.2389	0.2261	0.0516	0.2261	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

VOC EF: Solvent density = 6.46 lbs/gal, 100% organic volatiles



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Mike Fortner
Huhtamaki, Inc.
6629 Indianapolis Blvd.
Hammond, IN 46320

DATE: November 7, 2014

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

SUBJECT: Final Decision
Title V Operating Permit Renewal
089-33556-00228

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Richard Blastic, Plant Manager
Robert A. Steeves, Sevee & Maher Engineers, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

November 7, 2014

TO: Hammond Public Library

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

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

Applicant Name: Huhtamaki, Inc.
Permit Number: 089-33556-00228

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 11/7/2014 Huhtamaki Inc. 089-33556-00228 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	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		Mike Fortner Huhtamaki Inc. 6629 Indianapolis Blvd Hammond IN 46320 (Source CAATS)										CONFIRMED DELIVERY
2		Richard Blastic Plant Mgr Huhtamaki Inc. 6629 Indianapolis Blvd Hammond IN 46320 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
7		Hammond Public Library 564 State St Hammond IN 46320-1532 (Library)										
8		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
9		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
13		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
14		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
15		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (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.
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1		Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
3		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
4		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)										
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
6		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)										
7		Matt Mikus 1710 Vale Park Rd Apt 302 Valparaiso IN 46383 (Affected Party)										
8		Robert A Steeves Sevee & Maher Engineers, Inc. PO Box 85A, 4 Blanchard Rd. Cumberland ME 04021 (Consultant)										
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 8	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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