

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Inland Paperboard and Packaging Inc.
County Road 200N, 1 Mile East of SR 63
Newport, Indiana 47966**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-165-5445-00020	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information

The Permittee owns and operates a recycled paperboard mill plant, which manufactures corrugated medium.

Responsible Official: William Mozley
Source Address: County Road 200N, 1 Mile East of SR 63, Newport, Indiana 47966
Mailing Address: P. O. Box 428, Newport, Indiana 47966-0428
SIC Code: 2631
County Location: Vermillion
County Status: Attainment for all criteria pollutants
Source Status: Minor Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) A Paper Machine, PM-1, which has a capacity of 69,936 pounds per hour (lb/hr).
- (b) A High Density Stock Chest, HDSC-1, which has a capacity of 83,400 lb/hr.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source will not be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- a. It is a minor source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Construction Condition No. B.5, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).

Operation Conditions

B.6 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

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

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this recycled paperboard mill is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

B.9 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.10 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, and 326 IAC 2-7 (Part 70 Permit) will not apply.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Operation of Equipment

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

C.8 Compliance Monitoring

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.9 Maintenance of Monitoring Equipment

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
- (3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Record Keeping and Reporting Requirements

C.12 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.14 General Reporting Requirements

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.15 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Testing Requirements

C.16 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.1

FACILITY CONDITIONS

- (a) A Paper Machine, PM-1, which has a capacity of 69,936 pounds per hour (lb/hr).
- (b) A High Density Stock Chest, HDSC-1, which has a capacity of 83,400 lb/hr.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds [326 IAC 2-7 Part 70 Permit Requirements]

Any change or modification which may result to an increase in VOC potential emissions to 25 tons per year or more from the Paper Machine, PM-1 or the High Density Stock Chest, HDSC-1, shall require prior approval and be subject to the requirements of 326 IAC 2-7, Part 70 Permit. The emission factors used will be: 0.60 pound of VOC per bone dry ton of paperboard (BDTP) produced from the paper machine and 0.02 pound of VOC per BDTP for the High Density Stock Chest.

D.1.2 Volatile Organic Compounds

In the event that the stack tests demonstrate that the total VOC emissions exceeds 100 tons per year, the Office of Air Management, pursuant to applicable regulations shall reopen this permit for review.

Compliance Monitoring Requirements

D.1.3 Testing Requirements

The Permittee shall perform stack tests within 180 days after the issuance of this permit to verify the emission factors used in the calculations of the volatile organic compounds (VOC) emissions. These emission factors are noted in Condition D.1.1. The stack tests shall utilize the Methods under 40 CFR 60, Appendix A or other methods as approved by the Commissioner.

D.1.4 Preventive Maintenance Plan

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

Record Keeping and Reporting Requirements

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records of the paperboard produced from the Paper Machine and the Asphalt Dispersion/High Density Stock Chest.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Inland Container Corporation
 Source Location: County Road 200N, 1 Mile East of SR 63
 Newport, Indiana 47966
 County: Vermillion
 Construction Permit No.: CP-165-5445-00020
 SIC Code: 2631
 Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Inland Container Corporation relating to the construction and operation of a recycled paperboard mill plant, which manufactures corrugated medium. The sources consists of the following equipment:

- (a) A paper machine, PM-1, which has a capacity of 65,400 Bone Dry pounds per hour (lb/hr) of paper. This facility has been constructed on November 29, 1973.
- (b) An High Density Stock Chest Asphalt Dispenser, HDSC-1, which has a capacity of 83,400 Bone Dry pounds per hour of paper. Part of this facility was constructed on November 29, 1973 and was modified on May 18, 1989.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV-5	Fourdrinier Low Vacuum Exhaust	41	0.83	680	149
SV-10	East Vacuum Pump Exhaust	67	3.0	9,400	144
SV-11	West Vacuum Pump Exhaust	67	4	32,000	141
SV-6	Fourdrinier Wire Tray Exhaust	72	5.0	63,000	85
SV-4a	Paper Machine	69	4.5	48,000	88
SV-4b	Paper Machine	69	4.5	48,000	88
SV-4c	Paper Machine	69	4.5	48,000	88
SV-4d	Paper Machine	69	4.5	48,000	88
SV-4e	Paper Machine	69	4.5	48,000	88
SV-4f	Paper Machine	69	4.5	48,000	88
SV-4g	Paper Machine	69	4.5	48,000	88

SV-7a	Paper Machine Dryer	41	5.0	57,000	130
SV-7b	Paper Machine Dryer	41	5.0	57,000	130
SV-7c	Paper Machine Dryer	41	5.0	57,000	130
SV-8a	Paper Machine Dryer	41	5.0	57,000	130
SV-8b	Paper Machine Dryer	41	5.0	57,000	130
SV-8c	Paper Machine Dryer	41	5.0	57,000	130
SV-8d	Paper Machine Dryer	41	5.0	57,000	130
SV-8e	Paper Machine Dryer	41	5.0	57,000	130
SV-9	Paper Machine Dry-end	69	4.0	48,000	84
SV-13	High Density Stack Chest (HDSC-1)	120	0.83	600	180

Enforcement Issue

IDEM is aware that this paper mill plant has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

Information, unless otherwise stated, 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 March 14, 1996, with series of additional information received on September 4, 1997, and October 28, 1997.

Emissions Calculations

(1) Volatile Organic Compounds (VOC) Emissions:

Paper stock is diluted with water, and impurities are dispersed in the asphalt dispenser. Stock is delivered from the dispenser via a pipe to the High Density Stock Chest (HDSC). This is where the paper stock is mixed and consistency changed before going to the paper machine.

At the Paper Machine, PM-1, the stock mixture flows into a moving screen. As a paperboard web begins to form, it is passed through the machine press section then through the steam heated dryer section. The dried paperboard is then calendared and wound into rolls.

The company had performed a total source hydrocarbon air emissions tests in January and February of 1996, to determine VOC emission factor for the Paper Machine and the Asphalt Dispersion/High Density Stock Chest. The following are the emission factors determined: 0.60 pound of VOC per bone dry ton of paperboard (BDTP) produced from the paper machine, and a 0.02 pound of VOC per BDTP for the Asphalt Dispersion/High Density Stock Chest.

The stack tests done, were not certified by the Compliance Data Section. Therefore, these emission factors will be verified through other tests. The company agreed to these tests, and would be scheduled after 270 days from the issuance of this permit.

Facility	Production Rate (BDTP/day)	Emission Factor (lb/BDTP)	VOC Emissions (ton/yr)
Paper Machine	785.0	0.60	85.6
Asphalt Dispersion/High Density Stock Chest	1,000.8	0.02	3.65
TOTAL			89.25

Note: There are no PM emissions from these facilities, because the paperboard production utilizes a wet process.

Methodology:
 VOC emissions, ton/yr = production rate, BDTP/day * Emissions factor, lb/BDTP * 365 day/yr
 * ton/2000 lb

(2) Combustion Emissions:

Although the source have some combustion facilities for paper drying, no emissions from fuel combustion will result from these facilities. The company buys and uses steam coming from a local utility.

(3) Hazardous Air Pollutants:

Water is added to corrugated paperboard to break the paper apart, and Methanol is a by-product of this process. Methanol becomes airborne when the solubilized paper is heated. During the tests the methanol determined was 6.5 tons/year.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO ₂)	0.0	0.0
Volatile Organic Compounds (VOC)	89.25	89.25
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO _x)	0.0	0.0
Single Hazardous Air Pollutant (HAP)	6.5	6.5
Combination of HAPs	6.5	6.5

Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vermillion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vermillion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity). There are no control equipment installed at the source, therefore, the potential uncontrolled emissions are synonymous to after control emissions:

Pollutant	Emissions (ton/yr)
PM	0.0
PM10	0.0
SO ₂	0.0
VOC	89.25
CO	0.0
NO _x	0.0

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (1) New Source Performance Standards
There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this source.
- (2) National Emission Standards for hazardous Air Pollutants (NESHAP)
There are no NESHAPs applicable to this source.

State Rule Applicability

- (1) 326 IAC 8-1-6: General Reduction Requirements
New facilities as of January 1, 1980, which have potential emissions of 25 tons of VOC per year, located anywhere in the state, which are not otherwise regulated by other provisions of article 326 IAC 8, shall reduce VOC emissions using best available control technology (BACT).
 - (a) The Paper Machine, PM-1 will not be subject to this rule, although its potential VOC emissions is at 85.6 tons per year, because it was constructed in November 29, 1973, i.e. predating the rule.
 - (b) The Asphalt Dispersion/High Density Stock Chest, HDSC-1, will not be subject to 326 IAC 8-1-6 either, because its VOC potential emissions of 3.65 tons/year are less than 25 tons/year.
- (2) 326 IAC 8-6-1: Organic Solvent Emissions Limitations
This rule applies to sources commencing construction between October 7, 1974, and January 1, 1980, with potential VOC emissions of 100 tons/year or greater. The Paper Machine, PM-1 and the Asphalt Dispersion/High Density Stock Chest, HDSC-1, are not subject to this rule, because both were constructed in 1973 and do not emit 100 tons of VOC per year or greater.
- (3) 326 IAC 6-3-2: Particulate Allowable Emissions
The source is not subject to this rule because it does not emit PM. The paperboard production utilizes a wet process.
- (4) 326 IAC 2-6: Emission Reporting
This rule will not apply to this source, since its potential to emit volatile organic compound (VOC) is not 100 tons per year or greater.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This new source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

Conclusion

The construction of this recycled paperboard mill plant will be subject to the conditions of the attached proposed **Construction Permit No. CP- 165-5445-00020**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Inland Paperboard and Packaging Inc.
Source Location: County Road 200N, 1 Mile East of SR 63, Newport, Indiana 47966
County: Vermillion
Construction Permit No.: CP-165-5445-00020
SIC Code: 2631
Permit Reviewer: Aida De Guzman

On May 22, 1998, the Office of Air Management (OAM) had a notice published in the Daily Clintonian in Clinton, Indiana, stating that Inland Paperboard and Packaging Inc. had applied for a construction permit to construct and operate a recycled paperboard mill plant. The notice also stated that OAM proposed to issue a permit for this installation 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.

The OAM has determined to make the following changes to the permit.

1. The emission factors that are used in the calculations are made a part of condition D.1.
2. The following C.16 Performance Testing, which was referenced in the proposed Condition C.12(a) was inadvertently deleted. This condition is added in the final permit:

Testing Requirements

C.16 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

On June 23, 1998, Inland Paperboard and Packaging Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and strikeout for emphasis):

Comment #1

First of all Inland Container Corporation changed it's name in August 1996 to Inland Paperboard and Packaging Inc.

Response #1

The name of the company throughout the permit has been changed to the new name of Inland Paperboard and Packaging Inc.

Comment #2

Secondly, our mill does not have any sources of combustion to dry the paper or for any purpose. We do not have any of the traditional emissions associated with boilers. We purchase steam from the nearby Cinergy electric power generating station near Cayuga, IN. Therefore, could you place a statement in the permit, perhaps in the Technical Support Document or somewhere, stating that Inland Paperboard and Packaging is not required to have the traditional compliance monitoring equipment, emission control devices, preventive maintenance plan, opacity limitations, maintenance of monitoring equipment and records, collecting and maintaining records of monitoring data, etc.? It is my understanding that the sections in the permit can not be deleted but perhaps you could insert a phrase in the pertinent sections that "this does not apply to the Permittee at this time"?

Response #2

The language for many of the concerned conditions will remain. Although the condition may not apply at this time, it is possible that the language may be applicable in the future. To eliminate a lengthy addition to the permit in the future, the wording will be kept for now.

Comment #3

Third, there is a disagreement between D.1.3 and page 3 of the TSD concerning the number of days after the permit is issued that we have to submit a recheck of our vent monitoring data from 1996. We would like to recheck three vents 270 days or more after the final permit is issued. I would recommend the High Density Stock Chest, a pulper vent, and a paper machine vent. This would allow us proper time to budget for this expenditure.

Response #3

After discussing this issue with the Compliance Data Section, it was decided that the 180 day time frame for testing was appropriate. If the company found that the emission factors were incorrect and the 270 day time frame had been used, then nearly one year would have passed with the incorrect factors in use. Thus, the 180 day period will be used.

Comment #4

Do you want to use our 911 address also?

Response #4

The 911 address is not necessary at this time.

Comment #5

The paper machine now has a normal capacity of 69,500 bone dry lb/hr and can peak at 69,936 bone dry lb/hr.

Response #5

The capacity of the paper machine will be changed to 69,936 bone dry lb/hr. This adjustment will cause the following changes:

- a) Page 3 of the Technical Support Document. The table will change to:

Facility	Production Rate (BDTP/day)	Emission Factor (lb/BDTP)	VOC Emissions (ton/yr)
Paper Machine	785.0 839.2	0.60	85.6 91.9
Asphalt Dispersion/High Density Stock Chest	1,000.8	0.02	3.65
TOTAL			89.25 95.55

Note: There are no PM emissions from these facilities, because the paperboard production utilizes a wet process.

Methodology:

VOC emissions, ton/yr = production rate, BDTP/day * Emissions factor, lb/BDTP * 365 day/yr * ton/2000 lb

- (b) The capacity change from 785 BDTP/day to 839.2 BDTP/day in the above table for the Paper Machine will also result in the following revision to the **Total Potential and Allowable Emissions**, and the **Source Status** both on page 4 of 6 of the Technical Support Document (TSD) :

Total Potential and Allowable Emissions

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO ₂)	0.0	0.0
Volatile Organic Compounds (VOC)	89.25 95.55	89.25 95.55
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO _x)	0.0	0.0
Single Hazardous Air Pollutant (HAP)	6.5 6.95	6.5 6.95
Combination of HAPs	6.5 6.95	6.5 6.95

Source Status

Pollutant	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0
Particulate Matter (PM10)	0.0
Sulfur Dioxide (SO ₂)	0.0

Volatile Organic Compounds (VOC)	89.25 95.55
Carbon Monoxide (CO)	0.0
Nitrogen Oxides (NO _x)	0.0
Single Hazardous Air Pollutant (HAP)	6.95
Combination of HAPs	6.95

Comment #6

The Asphalt Dispenser (Dispersion Unit) has been removed and destroyed. The High Density Stock Chest has the same capacity of 83,400 lb/hr but the Emission Factor should be less than 0.02 lb/BDTP since the Asphalt Dispersion Unit is gone and we are not adding steam to the paper stock there any more.

Response #6

The Asphalt Dispenser (Dispersion Unit) has been deleted from the emission unit list in Section A, Section D, and from the above table in Response #5.

Comment #7

Perhaps we should submit two Affidavits of Construction, one for the original construction in 1973 and one for the upgrade in 1990 in phases?

Response #7

No, this is not necessary. One affidavit of construction is all that is needed to submit.

Comment #8

What will the annual fee be?

Response #8

The annual operating permit fee will be \$200.

Comment #9

B.7, C.2, C.6, C.8, C.9, C.12, C.14, C.16, and D.14. These are the sections that do not apply to Inland Paperboard and Packaging as mentioned previously.

Response #9

This comment was answered in response #2.

Comment #10

D.1 Changes are the same as A.2.

Response #10

This comment was answered in response #6.

Comment #11

D.1.1 Perhaps "...potential emissions to 25 tons..." should read "...potential emissions of 25 tons...".

Response #11

Instead of the suggested language change, the wording "... increase VOC emissions..." has been changed to "... increase in VOC emissions...".

Comment #12

D.1.3 This should match TSD page 3.

Response #12

This comment was answered in response #3.

Comment #13

TSD page 3 Emission Calculation (2) - "Although the source have some combustion..." should read "Since the source has no combustion...".

Response #13

Item (2), Combustion Emissions on page 3 of 6 of the TSD will be revised to read as follows (changes are bolded and strikeout for emphasis):

~~Although~~ **No emissions from fuel combustion for paper drying will occur because the company buys and uses steam coming from a local utility** ~~the source have some combustion facilities for paper drying, no emissions from fuel combustion will result from these facilities. The company buys and uses steam coming from a local utility.~~

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Inland Paperboard and Packaging Inc.
P. O. Box 428
Newport, Indiana 47966

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Inland Paperboard and Packaging Inc., County Road 200N, 1 Mile East of SR 63, Newport, Indiana 47966, has constructed the recycling paperboard plant consisting of the following equipment: (a) a Paper Machine, PM-1, which has a capacity of 69,936 pounds per hour (lb/hr), and (b) an High Density Stock Chest Asphalt Dispenser, HDSC-1, which has a capacity of 83,400 lb/hr, in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on March 14, 1996, and as permitted pursuant to **Construction Permit No. CP-165-5445, Plant ID No. 165-00020** issued on _____
5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.
My Commission expires: _____

Signature

Name (typed or printed)