

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Rock-Tenn Company Mill Division
800A South Romy
Eaton, Indiana 47338**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued 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 and 326 IAC 2-1-3.2 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.: T035-7582-00041	
Issued by: Felicia R. George, Assistant Commissioner 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 [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paperboard mill operation.

Responsible Official: Thomas R. Pease
Source Address: 800A South Romy, Eaton, Indiana 47338
Mailing Address: 800A South Romy, Eaton, Indiana 47338
SIC Code: 2631, 2679
County Location: Delaware
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) Cleaver Brooks natural gas fired boiler with fuel oil No. 2 and No. 6 as the back-up fuels, identified as Unit No. 1, with a maximum capacity of seventy-five (75) million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S₁);
- (2) One (1) paper machine, identified as Unit No. 2, with a maximum process weight rate of 12.5 tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a}, S_{4b}, S_{4c}, and S_{4d});
- (3) Seven (7) line machines, each consisting of of one (1) recycled paperboard strip fabricator and one (1) partition assemblers, identified as Unit No. 3, using the cyclone from the scrap suction system (Unit No. 6) as control, exhausting to one (1) stack (S₃).
- (4) Four (4) low pressure steam electronically fired adhesive applicators attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators, identified as Unit No. 4, with a maximum capacity of 4.9 pounds per hour (lb/hr);
- (5) One (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control, identified as Unit No. 5, with a maximum capacity of 24.5 pounds per hour (lb/hr), exhausting to one (1) stack (S₂); and
- (6) One (1) scrap suction system, including a seventeen (17) inch diameter piping system, a 13 foot diameter roof top cyclone, and an automatic scrap paper baler, identified as Unit No. 6, exhausting to one (1) stack (S₃).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year 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

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, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The 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 compliance 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, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, OAM, 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 Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:
 - (1) The applicable requirements are included and specifically identified in this permit;
 - (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.
- (b) 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.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, 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.
- (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, OAM, 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, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Forms or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this

subsection.

B.17 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 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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, OAM, 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, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

-
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of his permit; and

- (B) 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. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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, OAM 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 in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

- (a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit

terms and conditions. During this period, the Permittee need not comply with the existing permit

terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 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 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)(D)(I) 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.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.24 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in 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, OAM 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.25 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

The total source potential emissions of Sulfur Dioxide (SO₂) and Nitrogen Oxide (NO_x) are limited to less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 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]

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

All air pollution control equipment listed in this permit shall be 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.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by 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 before the intended 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.

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will continue to comply with such requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 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.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [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 to be 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.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.17 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) The Permittee shall submit a certified, annual emission statement that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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.

C.18 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

- (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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (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.21 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) One (1) Cleaver Brooks natural gas fired boiler with fuel oil No. 2 and No. 6 as the back-up fuels, identified as Unit No. 1, with a maximum capacity of seventy-five (75) million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S₁).

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

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

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and CP 035-5202-00041, issued on June 13, 1996, the SO₂ emissions from the seventy-five (75) mmBtu per hour boiler when using fuel oil No. 6 shall not exceed one and six-tenths (1.6) pounds per mmBtu heat input.
- (b) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the seventy-five (75) mmBtu per hour boiler when using fuel oil No. 2 shall not exceed five-tenths (0.5) pounds per mmBtu heat input.

D.1.2 Fuel Limitation [326 IAC 2-1-3(i)(8)] [326 IAC 2-2-2(a)]

- (a) The fuel oil No. 6 usage shall be limited to 2,439 kgal/yr and sulfur content limit of 1.3% by weight. This will make 326 IAC 2-2 PSD and 40 CFR 52.21 not applicable.
- (b) The fuel oil No. 2 usage shall be limited to 3,171 kgal/yr and sulfur content limit of 1% by weight. This will make 326 IAC 2-2 PSD and 40 CFR 52.21 not applicable.
- (c) When using fuels other than natural gas, the fuel usage must comply with either of fuel oil No. 2 limit or the fuel oil No. 6 limit. The boiler is limited to 3,171 kgal/yr of fuel oil No. 2 or 2,439 kgal/yr of fuel oil No. 6. If the boiler is to use both fuel oil No. 2 and fuel oil No. 6 in the same year, the following conversion should be used to limit the fuel oil usage:
- (1) 1 gallon fuel oil No. 6 = 1.3 gallons fuel oil No. 2; or
 - (2) 1 gallon fuel oil No. 2 = 0.77 gallons fuel oil No. 6.

The fuel usage should be converted to one (1) fuel oil to show compliance with either of the two (2) fuel oil usage limits.

D.1.3 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(a) (Particulate Emissions Limitations for Indirect Heating Sources) the particulate matter (PM) emissions from the 75 mmBtu/hr boiler (Unit No. 1) shall not exceed 0.64 pounds per million Btu.

D.1.4 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 and its control device.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil No. 6 sulfur content does not exceed one and three-tenths percent (1.3%) by weight and that the fuel

oil No. 2 sulfur content does not exceed one percent (1%) by weight by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the seventy five (75) mmBtu per hour boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

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

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

D.1.6 Monitoring

The Permittee shall record monthly and report quarterly the fuel oil No. 2 and fuel oil No. 6 usage and the percentage by weight of sulfur in the fuel.

- (1) The 75 mmBtu/hr boiler shall be limited to 2,439 kilogallons of fuel oil No. 6 (and fuel oil No. 2 using the conversion of 1 gallon of fuel oil No. 2 = 0.77 gallons of fuel oil No. 6) usage per year, based on a 12 month period, rolled on a monthly basis. The sulfur content of the fuel oil No. 6 shall not exceed 1.3% by weight.
- (2) The 75 mmBtu/hr boiler shall be limited to 3,171 kilogallons of fuel oil No. 2 (and fuel oil No. 6 using the conversion of 1 gallon of fuel oil No. 6 = 1.3 gallons of fuel oil No. 2) usage per year, based on 12 month period, rolled on a monthly basis. The sulfur content of the fuel oil No. 2 shall not exceed 1% by weight.

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when the boiler is not using natural gas. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
 - (4) Fuel supplier certifications.

The fuel supplier certification shall contain, as a minimum, the following:

- (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.10 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (2) One (1) paper machine, identified as Unit No. 2, with a maximum process weight rate of 12.5 tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a} , S_{4b} , S_{4c} , and S_{4d}).

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the one (1) paper machine at the process weight rate of 12.5 ton/hr, shall not exceed 22.26 pounds per hour emission rate established in the following formula:

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

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

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the one (1) line machine stack exhausts shall be performed during normal daylight operations. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.2.4 Record Keeping Requirements

To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the one (1) line machine stack exhausts.

SECTION D.3 FACILITY OPERATION CONDITIONS

- (3) Seven (7) line machines, each consisting of of one (1) recycled paperboard strip fabricator and one (1) partition assemblers, identified as Unit No. 3, using the cyclone from the scrap suction system (Unit No. 6) as control, exhausting to one (1) stack (S₃).

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

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

Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the seven (7) line machines shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.3.3 Particulate Matter (PM)

The one (1) scrap suction system (Unit No. 6) and the cyclone for particulate matter (PM) control shall be in operation at all times when the seven (7) line machines are in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

- (4) Four (4) low pressure steam electronically fired adhesive applicators attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators, identified as Unit No. 4, with a maximum capacity of 4.9 pounds per hour (lb/hr).

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

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8]

Any change or modification to this facility that would lead to an increase in any criteria pollutant emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.4.3 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.

SECTION D.5 FACILITY OPERATION CONDITIONS

- (5) One (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control, identified as Unit No. 5, with a maximum capacity of 24.5 pounds per hour (lb/hr), exhausting to one (1) stack (S₂).

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

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-5(c), the particulate matter (PM) from the one (1) spray booth shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.5.2 Volatile Organic Compound (VOC) [326 IAC 8]

Any change or modification to this facility that would lead to an increase in any criteria pollutant emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.5.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other

abnormal emission is observed. The Compliance Response Plan shall be followed

whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Compliance Response Plan.

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

D.5.5 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.5.4, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Compliance Response Plan.

SECTION D.6 FACILITY OPERATION CONDITIONS

- (6) One (1) scrap suction system, including a seventeen (17) inch diameter piping system, a 13 foot diameter roof top cyclone, and an automatic scrap paper baler, identified as Unit No. 6, exhausting to one (1) stack (S₃).

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

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the one (1) scrap suction system shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.6.3 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the one (1) scrap suction system is in operation.

D.6.4 Visible Emissions Notations

- (a) Daily visible emission notations of the scrap suction system and seven line machines (Unit No. 3) stack exhaust shall be performed during normal daylight operations. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rock-Tenn Company Mill Division
Source Address: 800A South Romy, Eaton, Indiana 47338
Mailing Address: 800A South Romy, Eaton, Indiana 47338
Part 70 Permit No.: T035-7582-00041

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:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Rock-Tenn Company Mill Division
Source Address: 800A South Romy, Eaton, Indiana 47338
Mailing Address: 800A South Romy, Eaton, Indiana 47338
Part 70 Permit No.: T035-7582-00041

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Rock-Tenn Company, Mill Division
Source Address: 800A South Romy, Eaton, Indiana 47338
Mailing Address: 800A South Romy, Eaton, Indiana 47338
Part 70 Permit No.: T035-7582-00041

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

Report period

Beginning: _____

Ending: _____

Alternate Fuel

Days burning alternate fuel

From To

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rock-Tenn Company Mill Division
 Source Address: 800A South Romy, Eaton, Indiana 47338
 Mailing Address: 800A South Romy, Eaton, Indiana 47338
 Part 70 Permit No.: T035-7582-00041
 Facility: 75 mmBtu/hr boiler (Unit No. 1)
 Parameter: Sulfur Dioxide (SO₂)

Limit: The fuel oil no. 2 usage shall be limited to 3,171 kgal/year , based on a 12 month period, rolled on a monthly basis. The sulfur content of the fuel oil No. 2 shall not exceed 1% by weight. The fuel oil No. 6 usage shall be limited to 2,439 kilogallons per year, based on a 12 month period, rolled on a monthly basis. The sulfur content of the fuel oil No. 6 shall not exceed 1.3% by weight.

YEAR: _____

Month	Sulfur Content % Fuel oil No. 2	Sulfur Content % Fuel oil No. 6	Fuel Oil No. 2 Usage this Month (kgal)	Fuel Oil No. 6 Usage this Month (kgal)	Gallons of Fuel Oil No. 2 Usage Past 12 Months (kgal)	Gallons of Fuel Oil No. 6 Usage Past 12 Months (kgal)	Fuel Oil No. 6 usage conversion to Fuel Oil No. 2 usage this month: 1 gal No. 6 = 1.3 gal No. 2	Total Gallons of fuel usage in fuel oil No. 2 usage Past 12 Months (kgal)	Monthly Average of fuel oil No. 2 (kgal)

9 No deviation occurred in this quarter. _____

Title / Position: _____

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

Signature: _____

Submitted by: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE REPORT**

Source Name: Rock-Tenn Company Mill Division
 Source Address: 800A South Romy, Eaton, Indiana 47338
 Mailing Address: 800A South Romy, Eaton, Indiana 47338
 Part 70 Permit No.: T035-7582-00041

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Rock-Tenn Company Mill Division
Source Location: 800A South Romy, Eaton, Indiana 47338
County: Delaware
SIC Code: 2631, 2679
Operation Permit No.: T035-7582-00041
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Rock-Tenn Company Mill Division relating to the operation of a paperboard mill operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) Cleaver Brooks natural gas fired boiler with fuel oil No. 2 and No. 6 as the back-up fuels, identified as Unit No. 1, with a maximum capacity of seventy-five (75) million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S_1);
- (2) One (1) paper machine consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator, identified as Unit No. 2, with a maximum process weight rate of ten (10) tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a} , S_{4b} , S_{4c} , and S_{4d});
- (3) Seven (7) partition assemblers, identified as Unit No. 3, exhausting to one (1) stack (S_3);
- (4) Four (4) low pressure steam electronically fired adhesive applicators attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators, identified as Unit No. 4, with a maximum capacity of four and nine-tenths (4.9) pounds per hour (lb/hr);
- (5) One (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control, identified as Unit No. 5, with a maximum capacity of twenty-four and five-tenths (24.5) pounds per hour (lb/hr), exhausting to one (1) stack (S_2); and
- (6) One (1) scrap suction system, including a seventeen (17) inch diameter piping system, a thirteen (13) foot diameter roof top cyclone, and an automatic scrap paper baler, identified as Unit No. 6, exhausting to one (1) stack (S_3).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Sixteen (16) natural gas fired space heaters each with a rated heat input at 0.15 million British thermal units per hour (mmBtu/hr), for a total heat input rate at 2.4 mmBtu/hr;
- (2) One (1) MSK automatic bag machine, utilizing one (1) 1.3 mmBtu/hr (rated) natural gas fired space heater;
- (3) One (1) stand-alone recycled paper board strip fabricator;
- (4) One (1) roll-transfer laminator with an in-line recycled paperboard strip fabricator;
- (5) Eighteen (18) ink applicators utilizing a metered ink dropping process from a one (1) pint reservoir and stamp roller applicator;
- (6) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured as 20°C (68°F);the used of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (7) Combustion sources flame safety purging on startup;
- (8) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (9) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (11) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (12) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (14) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (15) Paved and unpaved roads and parking lots with public access;
- (16) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (17) Stationary fire pumps;
- (18) Wastewater treatment using a biocide;
- (19) Hydro pulper (paper mill) - wastepaper input;
- (20) Stock cleaning - physical process, reject material is sent to landfill;
- (21) Paper machine dryers - boiler steam applied;
- (22) Calendar stack - rolled to customers need
- (23) Rewinder - slitter and rerolled; and
- (24) Product storage (fuel oil) - 268,000 gallons of No. 2;

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 035-3873, issued on February 28, 1995, amended on April 13, 1995, (no amendment number assigned).
- (2) CP 035-5202, issued on June 13, 1996.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996.

A Notice of Administrative Completeness was mailed to the source on January 15, 1997.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	greater than 250
VOC	less than 100
CO	less than 100
NO _x	greater than 100, less than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
1, 3 Butadiene	less than 10
Styrene	less than 10
TOTAL	less than 10

- (a) The potential emissions (as defined in the Indiana Rule) of Sulfur Dioxide (SO₂) and oxides of nitrogen (NO_x) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source’s emission data. The Office of Air Management (OAM) does not have any available information on the OAM Emission Inventory.

Pollutant	Actual Emissions (tons/year)
PM	11.48
PM-10	11.48
SO ₂	0.13
VOC	4.44
CO	7.48
HAP (1,3 Butadiene)	0.11
HAP (Styrene)	0.11
NO _x	29.9

County Attainment Status

The source is located in Delaware County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (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. Delaware County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) 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.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The 75 million British thermal units per hour boiler is not subject to the requirements of

the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db), because the boiler was constructed in 1969 which is prior to the June 19, 1984 applicability date. The 75 million British thermal units per hour boiler was issued a Construction Permit (CP 035-5202-00041) on June 13, 1996, to change the main fuel from natural gas to fuel oil no. 6. This change does not constitute a modification, pursuant to 40 CFR 60.14.

- (c) The 75 million British thermal units per hour boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the boiler was constructed in 1969 which is prior to the June 9, 1989 applicability date. The 75 million British thermal units per hour boiler was issued a Construction Permit (CP 035-5202-00041) on June 13, 1996, to change the main fuel from natural gas to fuel oil no. 6. This change does not constitute a modification, pursuant to 40 CFR 60.14.
- (d) There are National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Sulfur Dioxide (SO₂) and oxides of nitrogen (NO_x). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 7-1 (Sulfur Dioxide Emission Limitation)

The 75 mmBtu/hr boiler (Unit No. 1) was modified, pursuant to CP 035-5202-00041, issued on June 13, 1996, to change the main fuel from natural gas to fuel oil no. 6. The Part 70 Permit Application states that the primary fuel will be natural gas with backup fuels being fuel oil no. 2 and fuel oil no. 6.

The 75 mmBtu/hr boiler (Unit No. 1) when using fuel oil No. 2 will be subject to this rule. The rule mandates an allowable SO₂ emission of 0.5 pound per million British thermal unit (lb/mmBtu).

$$\begin{aligned}\text{SO}_2 \text{ Allowable Emission} &= 0.5 \text{ lb/mmBtu} * 75 \text{ mmBtu/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} \\ &= 164.25 \text{ tons/year}\end{aligned}$$

The 75 mmBtu/hr boiler (Unit No. 1) when using fuel oil No. 6 will be subject to this rule. The rule mandates an allowable SO₂ emission of 1.6 pound per million British thermal unit (lb/mmBtu).

$$\begin{aligned}\text{SO}_2 \text{ Allowable Emission} &= 1.6 \text{ lb/mmBtu} * 75 \text{ mmBtu/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} \\ &= 525.6 \text{ tons/year}\end{aligned}$$

Since these SO₂ emissions are greater than the PSD level of 250 tons/yr, emissions will be limited at 249 tons/yr to be a minor source.

$$\begin{aligned}\text{Fuel Oil No. 6 Usage Limitation} &= 249 \text{ tons/yr} * 2000 \text{ lb/ton} * \text{kgal}/157 \text{ lb} (1.3\%) \\ &= 2,439 \text{ kgal/year}\end{aligned}$$

With the fuel usage limitation of 2,439 kgal/yr and sulfur content limit of 1.3% by weight, 326 IAC 7-1 allowable emissions will be met. This limitation will also make 326 IAC 2-2 PSD and 40 CFR 52.21 not applicable.

Accordingly, the NO_x emissions when using fuel oil No. 6 will also be truncated to:

NO_x Allowable Emissions with the fuel usage limitation will be sixty-seven and one tenth (67.1) tons per year.

$$\text{NO}_x \text{ Allowable Emission} = 2,439 \text{ kgal/year} * 55 \text{ lb/kgal} * \text{ton}/2000 \text{ lb} = 67.1 \text{ tons/year}$$

326 IAC 2-2 (Prevention of Significant Deterioration)

The 75 mmBtu/hr boiler (Unit No. 1) has potential SO₂ emissions of 372.38 tons per year when using fuel oil No. 2.

$$\begin{aligned}\text{Fuel Oil No. 2 Throughput, kgal/yr} &= 75 \text{ mmBtu/hr} * 8760 \text{ hr/year} * \text{kgal}/1000 \text{ gal} * \\ &\text{gal}/0.1385 \text{ mmBtu} = 4,743.68 \text{ kgal/year}\end{aligned}$$

$$\begin{aligned}\text{SO}_2 \text{ Potential Emissions} &= 4,743.68 \text{ kgal/year} * 157 \text{ lb/kgal} * \text{ton}/2000 \text{ lb} \\ &= 372.38 \text{ tons/year}\end{aligned}$$

Since these SO₂ emissions are greater than the PSD level of 250 tons/year, emissions will be limited to 249 tons/yr to be a minor source. The fuel oil No. 2 usage will be limited to 3,171 kgal/yr with a sulfur content of 1% by weight.

$$\text{Fuel Oil No. 2 Usage Limitation} = 249 \text{ tons/year} * 2000 \text{ lb/ton} * \text{kgal}/157 \text{ lb} (1\%) = 3,171 \text{ kgal/yr}$$

$$\begin{aligned}\text{Fuel Oil No. 2 Limited SO}_2 \text{ Emission} &= 3,171 \text{ kgal/yr} * 157 \text{ lb/kgal} (1\%) * \text{ton}/2000 \text{ lb} \\ &= 248.92 \text{ tons/yr}\end{aligned}$$

The 75 mmBtu/hr boiler total SO₂ emissions will be limited to 249 tons per year. When using natural gas the boiler will be in compliance. When using fuels other than natural gas, the fuel usage must comply with either the fuel oil No. 2 or fuel oil No. 6 limit. The boiler is limited to 3,171 kilogallons of fuel oil No. 2 usage per year or 2,439 kilogallons of fuel oil No. 6 usage per year. If the boiler is to use both fuel oil No. 2 and fuel oil No. 6 in the same year, the following conversion should be used to limit the fuel oil usage:

1 gallon fuel oil No. 6 = 1.3 gallons fuel oil No. 2; or

1 gallon fuel oil No. 2 = 0.77 gallons fuel oil No. 6.

The fuel usage should be converted to one (1) fuel oil to show compliance with either of the two (2) fuel oil usage limits.

326 IAC 6-2-3 (Particulate Emissions (PM) Limitations for Indirect Heating Sources)

Pursuant to this 326 IAC 6-2-3(a), the particulate matter (PM) emissions from the 75 mmBtu/hr boiler (Unit No. 1) constructed in 1969, modified in 1996, shall not exceed 0.64 pounds per million Btu.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

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

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q}{\sum_{i=1}^N p_{a_i} \times Q}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For the 75 mmBtu/hr boiler:

$$C = 50$$

$$Q = 75$$

$$N = 1$$

$$a = 0.67$$

$$h = 37$$

$$Pt = 0.64$$

The 75 mmBtu/hr boiler is limited to 0.64 lb/mmBtu.

The 75 mmBtu/hour (Unit No. 1) is in compliance by the following equations:

Using natural gas as fuel:

13.7 lb/MMCF, to convert this to lb/mmBtu

$$= 7.8 \text{ lb/kgal} * \text{kgal}/1000 \text{ gal} * \text{gal}/0.15 \text{ mmBtu}$$

$$= 0.052 \text{ lb/mmBtu} < 0.64 \text{ lb/mmBtu}$$

Therefore the boiler is in compliance when using natural gas.

Using fuel oil No. 2 for combustion:

2 lb/kgal * kgal/1000 gal * gal/0.1385 mmBtu

$$= 0.014 \text{ lb/mmBtu} < 0.64 \text{ lb/mmBtu},$$

Therefore the boiler is in compliance when using fuel oil No. 2.

Using fuel oil No. 6 for combustion: S = 1.3%

(9.19 lb/kgal) (s) + 3.22 lb/kgal

$$= 15.2 \text{ lb/kgal} * \text{kgal}/1000 \text{ gal} * \text{gal}/0.134 \text{ mmBtu}$$

$$= 0.113 \text{ lb/mmBtu} < 0.64 \text{ lb/mmBtu}$$

Therefore the boiler is in compliance when using fuel oil No. 6.

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

The one (1) paper machine consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator (Unit No. 2) is not applicable to 326 IAC 8-2-5 (Paper Coating Operations) because the potential volatile organic compound (VOC) emissions are less than one hundred (100) tons per year and not in one of the listed existing counties even though this was an existing source as of January 1, 1980.

The four (4) low pressure steam electronically fired adhesive applicator attached to each of four

(4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators (Unit No. 4) is not applicable to 326 IAC 8-2-5 (Paper Coating Operations) because the potential volatile organic compound (VOC) emissions are less than one hundred (100) tons per year and not in one of the listed existing counties even though this was an existing source as of January 1, 1980.

The one (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control (Unit No. 5) is not applicable to 326 IAC 8-2-5 (Paper Coating Operations) because the potential volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year and not in one of the listed existing counties even though this facility was constructed after January 1, 1980.

The one (1) roll-transfer laminator with an in-line recycled paperboard strip fabricator (Insignificant Activity #5) is not applicable to 326 IAC 8-2-5 (Paper Coating Operations) because the potential emissions from the laminator are less than twenty-five tons (25) per year and not in one of the listed existing counties even though it was constructed after January 1, 1980.

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

The one (1) paper machine consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator (Unit No. 2) is not applicable to 326 IAC 8-1-6 (General Reduction Requirements) because it was constructed in 1969 which is prior to the January 1, 1980 applicability date.

The four (4) low pressure steam electronically fired adhesive applicator attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators (Unit No. 4) is not applicable to 326 IAC 8-1-6 (General Reduction Requirements) because it was constructed in 1969 which is prior to the January 1, 1980 applicability date.

The one (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control (Unit No. 5) is not applicable to 326 IAC 8-1-6 (General Reduction Requirements) because the potential emissions from this facility are less than twenty-five (25) tons per year even though it was constructed after the January 1, 1980 applicability date.

The one (1) roll-transfer laminator with an in-line recycled paperboard strip fabricator (Insignificant Activity #5) is not applicable to 326 IAC 8-1-6 (General Reduction Requirements) because the potential emissions from the laminator are less than twenty-five (25) tons per year even though it was constructed after January 1, 1980.

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

The one (1) paper machine consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator (Unit No. 2) is not applicable to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because it is not located in Lake or Marion County. Also, the source's potential VOC emissions are 0.6 tons per year, which is less than one hundred (100) tons per year, even though it was constructed prior to January 1, 1980.

The four (4) low pressure steam electronically fired adhesive applicator attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators (Unit No. 4) is not applicable to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because it is not located in Lake or Marion County. Also the source's potential VOC emissions are 0.6 tons per year, which is less than one hundred (100) tons per year, even though it was constructed prior to

January 1, 1980.

The one (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control (Unit No. 5) is not applicable to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because it was constructed in 1991 which is after the applicability date of October 1, 1980.

The one (1) roll-transfer laminator with an in-line recycled paperboard strip fabricator (Insignificant Activity #5) is not applicable to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because it is not located in Lake or Marion County and potential emissions are less than one hundred (100) tons per year, even though it was constructed prior to January 1, 1980.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-5, the particulate matter (PM) overspray from the one (1) paper machine (Unit No. 2), the seven (7) partition assemblers (Unit No. 3), the one (1) spray booth (Unit No. 5) and the one (1) scrap paper suction system (Unit No. 6) shall be limited by the following:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The scrap paper suction system (Unit No. 6) will comply with 326 IAC 6-3-2 (Process Operations) limit of 3.8 pounds per hour (lb/hr) by the use of a cyclone during system operation.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The one (1) 75 mmBtu/hour boiler (Unit No. 1) has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record monthly and report quarterly the fuel oil No. 6 usage and the percentage by weight of sulfur in fuel oil No. 6. The 75 mmBtu/hr boiler shall be limited to 2,439 kilogallons of fuel oil No. 6 (and fuel oil No. 2 using the conversion of 1 gallon of fuel oil No. 2 = 0.77 gallons of fuel oil No. 6) usage per year, based on a 12 month period, rolled on a monthly basis. The sulfur content of fuel oil No. 6 shall not exceed 1.3% by weight.

This monitoring condition is necessary to limit the sulfur dioxide emissions when using fuel oil No. 6 to 1.6 pounds per million British thermal unit (lb/mmBtu) to ensure compliance with 326 IAC 7-1 (Sulfur Dioxide Emission Limitation). This monitoring condition is also necessary to limit the SO₂ emissions to less than 250 tons per year. This limit will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) The Permittee shall record monthly and report quarterly the fuel oil No. 2 usage and the percentage by weight of sulfur in fuel oil No. 2. The 75 mmBtu/hr boiler shall be limited to 3,171 kilogallons of fuel oil No. 2 (and fuel oil No. 6 using the conversion of 1 gallon of fuel oil No. 6 = 1.3 gallons of fuel oil No. 2) usage per year, based on a 12 month period, rolled on a monthly basis. The sulfur content of fuel oil No. 2 shall not exceed 1% by weight.

This monitoring condition is necessary to limit the sulfur dioxide emissions when using fuel oil No. 2 to 0.5 pounds per million British thermal unit (lb/mmBtu) to ensure compliance with 326 IAC 7-1 (Sulfur Dioxide Emission Limitation). This monitoring condition is also necessary to limit the SO₂ emissions to less than 250 tons per year. This limit will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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) Part 70 Application Form GSD-08.

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

Conclusion

The operation of this paperboard mill operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T035-7582-00041**.

Description of facility: One (1) Cleaver Brooks boiler
Max Rating: Seventy-five (75) million British thermal units per hour (mmBtu/hr)
Construction Date: 1969
Control Device (if any): none
Stack/Vent ID: S₁

Facility class: **Description:** Boiler: Natural gas as primary fuel, fuel oil No. 2 and fuel oil No. 6 as back-up fuel

EMISSION LIMITATIONS				
Numerical Emission Limit:	1.6 pound SO ₂ per mmBtu for fuel oil No. 6	0.5 pound SO ₂ per mmBtu for fuel oil No. 2		
Regulation/Citation:	326 IAC 7-1, 326 IAC 2-2	326 IAC 7-1, 326 IAC 2-2		
Compliance Demonstration:	Quarterly Reporting	Quarterly Reporting		
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	N/A	N/A		
Testing Method/Analysis:	N/A	N/A		
Testing Frequency/Schedule:	N/A	N/A		
Submittal of Test Results:	N/A	N/A		
COMPLIANCE MONITORING				
Monitoring Description:	recording and reporting No. 6 fuel usage and sulfur content by weight of fuel oil	recording and reporting No. 2 fuel usage and sulfur content by weight of fuel oil		
Monitoring Method:	recording No. 6 fuel usage and sulfur content by weight of fuel oil	recording No. 2 fuel usage and sulfur content by weight of fuel oil		
Monitoring Regulation/Citation:	326 IAC 7-1, 326 IAC 2-2	326 IAC 7-1, 326 IAC 2-2		
Monitoring Frequency:	recording monthly, reporting quarterly	recording monthly, reporting quarterly		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	No. 6 fuel oil usage, sulfur content by weight of fuel oil	No. 2 fuel oil usage, sulfur content by weight of fuel oil		
Recording Frequency:	monthly	monthly		

REPORTING REQUIREMENTS				
Information in Report:	Sulfur Content by weight of fuel oil, fuel oil No. 6 usage for each month	Sulfur Content by weight of fuel oil, fuel oil No. 6 usage for each month		
Reporting Frequency/Submittal:	quarterly	quarterly		
Additional Comments:	N/A	N/A		

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Rock-Tenn Company, Mill Division
Source Location: 800A South Romy, Eaton, Indiana 47338
County: Delaware
SIC Code: 2631, 2679
Operation Permit No.: T035-7582-00041
Permit Reviewer: Cathie Moore

On October 28, 1997, the Office of Air Management (OAM) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that Rock-Tenn Company, Mill Division had applied for a Part 70 Operating Permit to operate a paperboard mill operation. The notice also stated that OAM proposed to issue a permit 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.

On November 25, 1997, Sara Schermerhorn of the Triad Engineering Incorporated representing Rock-Tenn Company submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows (strikeout added to show what was deleted and bold added to show what was added):

Comment 1:

A.2 Emission Units and Pollution Control Equipment Summary, Item (2), Page 6 of 46. Statement (2) reads "One (1) paper machine consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator, identified as Unit No. 2, with a maximum process weight rate of ten (10) tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a}, S_{4b}, S_{4c}, and S_{4d});". The paper machine does not consist of "seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator. Rock-Tenn requests that this statement be modified as follows: "One (1) paper machine, identified as Unit No. 2, with a maximum process weight rate of ten (10) tons per hour (ton/hr), exhausting to four stacks (S_{4a}, S_{4b}, S_{4c}, and S_{4d});". A review of the draft Title V Permit revealed this language on multiple pages including several sections of the Technical Support Document (TSD). Please make the requested change throughout the draft Title V Permit and the TSD.

Response to Comment 1:

The equipment description has been changed as requested on the Part 70 Permit. The Technical Support Document cannot be physically changed after Public Notice, but the changes are noted in this addendum to the Technical Support Document. The Part 70 Permit has been changed as follows:

The equipment on page 6 of 44 and page 32 of 44 has been changed to be as follows:

- (2) One (1) paper machine, ~~consisting of seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator,~~ identified as Unit No. 2, with a maximum process weight rate of ten (10) tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a}, S_{4b}, S_{4c}, and S_{4d});

None of the permit conditions have been changed.

Comment 2:

A.2 Emission Units and Pollution Control Equipment Summary, Item (3), Page 6 of 46. Statement (3) reads "Seven (7) partition assemblers, identified as Unit No. 3, exhausting to one (1) stack (S₃);". Rock-Tenn requests that this statement be changed to read: "Seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator and one (1) partition assembler;". This requested language is consistent with the language used to describe this process in Rock-Tenn's Construction permit CP 035-3873. A review of the draft Title V Permit revealed this language on multiple pages including several sections of the Technical Support Document (TSD). Please make the requested change throughout the draft Title V permit and the TSD.

Response to Comment 2:

The equipment description has been changed as requested on the Part 70 Permit as follows. The Technical Support Document cannot be physically changed after Public Notice, but the changes are noted here.

The equipment on page 6 of 44 and page 33 of 44 has been changed to be as follows (bold added for emphasis):

- (3) Seven (7) ~~partition assemblers~~ **line machines, each consisting of of one (1) recycled paperboard strip fabricator and one (1) partition assemblers**, identified as Unit No. 3, **using the cyclone from the scrap suction system (Unit No. 6) as control**, exhausting to one (1) stack (S₃).

Condition D.3.1 "Particulate Matter" has been changed to be as follows:

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

Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the seven (7) ~~partition assemblers~~ **line machines** shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Condition D.3.3 "Particulate Matter" has been changed to be as follows:

D.3.3 Particulate Matter (PM)

The **one (1) scrap suction system (Unit No. 6) and the cyclone** for particulate matter (PM) control shall be in operation at all times when the seven (7) ~~partition assemblers~~ **line machines** are in operation.

Comment 3:

Emission Limitations and Standards, C.1 PSD Minor Source Status, Item (c), page 20 of 46. Section

C.1 (c) reads "The source shall be allowed to add insignificant activities, as listed in 326 IAC 2-7-1(20), not already in this permit provided any modification that would lead to an increase in allowable emission greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to the New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur. tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply". There is an apparent typographical error present in this specific section. Rock-Tenn requests that "tons per 365 day period." be omitted from Section C.1(c).

Response to Comment 3:

This entire (c) section has been deleted from the Part 70 permit as decided by the Office of Air Management (OAM). Therefore, the typographical error has been corrected.

Comment 4:

Compliance Determination Requirements, D.1.5, Sulfur Dioxide Emissions and Sulfur Content, Page 30 of 46. Based on discussions with IDEM personnel, if the Permittee elects to determine compliance by using option (a), the Permittee has the option of fulfilling either item (1)(a) OR item (1)(b). The language in this section does not clearly indicate whether the Permittee is required to perform (1) AND (2) **or** (1) OR (2) under option (a). Rock-Tenn requests that "or" be incorporated into D.1.5 (a) (1) as follows: "(1) Providing vendor analysis of fuel delivered if accompanied by certification; or"

Response to Comment 4:

Condition D.1.5(a) "Sulfur Dioxide Emissions and Sulfur Content" has been changed from to be as follows:

- (a) Pursuant to ~~326 IAC 3-3-4~~ **326 IAC 3-7-4**, the Permittee shall demonstrate that the fuel oil No. 6 sulfur content does not exceed one and three-tenths percent (1.3%) by weight and that the fuel oil No. 2 sulfur content does not exceed one percent (1%) by weight by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; **or**
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

Comment 5:

Compliance Monitoring Requirements, D.1.7 Visible Emissions Notations, Page 30 of 46. D.1.7 indicates that visible emission notations must be performed during normal daylight operations (for the boiler, emission unit #1). Rock-Tenn requests the requirement be changed so that visible emission notations only need to be performed during normal daylight operations when the boiler is using fuel oil no. 6. As illustrated in the Technical Support Document (page 9 of 15), the maximum emission rate of particulate when burning natural gas or fuel oil no. 2 is magnitudes below the particulate limitation of 0.64 lbs/mmBtu which covers the boiler operation and therefore, performing daily visible emission notations is excessive and unnecessary.

Response to Comment 5:

Condition D.1.7 has been changed to state that visible emission notations only need to be performed

when the boiler is not using natural gas to be as follows:

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations **when the boiler is not using natural gas**. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Comment 6:

Emission Limitations and Standards, D.2.2, D.4.2, D.5.2, D.6.2, Preventive Maintenance Plan, Pages 32, 35, 37, and 39 of 46. D.2.2, D.4.2, D.5.2 and D.6.2 indicate that a Preventive Maintenance Plan (PMP) is required for emission units no. 2 (paper machine), no. 4 (adhesive applicators), no. 5 (spray booth), no. 6 (scrap suction system), respectively. According to IDEM personnel, recently issued guidance indicates PMPs are required for units emitting particulate matter, sulfur dioxide or volatile organic compounds only when the units are subject to the existing applicable requirements and if:

- 1) The unit is subject to a NSPS or NESHAP; or
- 2) The unit has a device to control emissions; and the allowable emission of the controlled pollutant exceed 10 pounds per hour; or
- 3) The unit does not have a control device, and has actual emissions exceeding 25 tons per hour; or
- 4) The unit would have been subject to an applicable requirement but for conditions limiting its potential to emit.

Using this criteria, Rock-Tenn believes that only emission unit no. 1 (boiler) will require a PMP. Rock-Tenn requests that the PMP requirements (called out as D.2.2, D.4.2, D.5.2, and D.6.2) be omitted from the Title V permit as the units called out under these sections do not meet the applicable thresholds as described above. Not, emission unit no. 3 is discussed further under item #7 of this letter.

Response to Comment 6:

Conditions D.2.2, D.3.2, D.4.2, D.5.3 and D.6.2 requiring Preventive Maintenance Plans have been deleted from the Part 70 permit.

Comment 7:

Emission Limitations and Standards, D.3.2 Preventive Maintenance Plan and Compliance Monitoring Requirements, D.3.5 Visible Emissions Notations, Page 33 of 46. D.3.2 indicates that a PMP is required

for emission unit #3 (seven line machines...see comment #2 of this letter). D.3.5 requires that visible emission notations be performed for emission unit #3 during normal daylight hours and a Compliance Response Plan be developed (CRP). Emission unit #3 exhausts to the cyclone system identified as emission unit #6 (the scrap suction system). Under D.6, the same requirements (PMP- D.6.2 and visible emission notations/CRP D.6.5) are included for emission unit #6. Therefore, the permit calls out requirements for the one (1) control device/exhaust point twice. Rock-Tenn requests that D.3.2 (requirement for PMP) and D.3.5 (requirement for visible emissions notations & CRP) be omitted in order to avoid confusion. The cyclone and its exhaust point will then be covered by D.6.2 and D.6.5.

Response to Comment 7:

The requirement for a Preventive Maintenance Plan has been removed from this section because the allowable emissions are less than ten (10) pounds per hour. Since the scrap suction system will be in operation whenever the seven line machines are in operation, the visible emission notations requirements have been deleted from Section D.3, but will still be in Section D.6. Condition D.3.3 has been changed to state that both the cyclone and the scrap suction system shall be in operation at all times when the seven line machines are in operation.

Comment 8:

Compliance Monitoring Requirements, D.5.5 Monitoring, Item (a), Page 38 of 46. D.5.5 (a) requires that daily inspections be performed to verify the placement, integrity and particulate loading of the filters. Rock-Tenn requests that the frequency of this requirement be changed to weekly. Proper operation and maintenance will be in place to ensure that the spray booth and its dry filters operate correctly. The spray booth operator and plant manager are responsible for ensuring required maintenance is performed according to the manufacturer's recommendations. In addition, the Preventive Maintenance Plan will be implemented and executed in accordance with D.5.3 which combined the weekly inspections of the stack exhaust, rooftop, and nearby ground required by D.5.5 (b) should guarantee that all problems are identified and corrected.

Response to Comment 8:

Condition D.5.5 is the Office of Air Management's (OAM) standard condition for any surface coating facilities that use dry filters as control because OAM believes that daily inspections are necessary to ensure compliance with 326 IAC 6-3-2(c) (Particulate Emission Limitations). Therefore, the condition has not been changed.

Comment 9:

Compliance Monitoring Requirements, D.6.5 Visible Emissions Notations, Page 39 of 46. D.6.5 requires that daily visible emissions be noted for the scrap suction system exhaust during normal daylight operations. Rock-Tenn requests that the frequency of this requirement be changed to weekly. Proper operation and maintenance will be in place to ensure that the scrap suction system and cyclone unit operate correctly. The electrician is responsible for ensuring required maintenance is performed according to manufacturer's recommendations. In addition, the Preventive Maintenance Plan will be implemented and executed in accordance with D.6.2 which combined the requested weekly visible emissions notations of the stack exhaust should guarantee that all problems are identified and corrected.

Response to Comment 9:

The Office of Air Management (OAM) believes that performing daily visible emissions notations is a reasonable method of periodically monitoring whether the emissions units are operating properly and in compliance with the particulate matter (PM) emissions limitations. Therefore, Condition D.6.5 has not

been changed as requested.

Comment 10:

Part 70 Operation Permit, Quarterly Compliance Report, Page 46 of 46. The draft Title V permit contains a form entitled "Quarterly Compliance Report", however, there is no language within the permit which describes this requirement or indicated it was necessary. Rock-Tenn requests that the Quarterly Compliance Report form and the implied requirement to do such be omitted from the permit. Rock-Tenn will submit the Annual Compliance Certification on July 1 each year (as required under B.11) and will report any deviations from the permit requirements within ten (10) calendar days from the date of discovery of the deviation (as required under B.16). In addition, B.13 requires Rock-Tenn to notify IDEM within four (4) daytime business hours after the beginning of an emergency which lasts more than one (1) hour. Reporting the compliance status on a quarterly basis seems redundant, cumbersome, and excessive given the other requirements being imposed on the Permittee.

Response to Comment 10:

The Quarterly Compliance Report is required by all Part 70 Permittees. There is now language in the permit that requires the report as follows:

Condition C.20 "General Reporting Requirements" has been changed to be as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (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)~~ **(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)~~ **(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)~~ **(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)~~ **(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.

- ~~(e)~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- ~~(f)~~(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.

Comment 11:

Technical Support Document. Upon completion of the 1997 Emission Statement (reporting the 1996 actual emissions), Rock-Tenn realized the usage of Nalco 7520, a raw material containing volatile organic compounds (VOC) used at emission unit #2, was underestimated. Form PI-26 in Rock-Tenn's Title V application, indicated the average usage of Nalco 7520 is 28,040 pounds per year, with a maximum usage rate being 5 pounds per hour. In 1996, Rock-Tenn used 59,207 pounds of Nalco 7520, nearly double the amount estimated in the Title V application. Rock-Tenn uses approximately 1.25 pounds of Nalco 7520 per ton of paper processed at emission unit #2, making the true maximum rate of Nalco 7520 12.5 pounds per hour. (1.25 lbs/ton x 10 ton/hr = 12.5 lbs/hr). Rock-Tenn requests all back-up calculations performed as part of the application review be corrected to reflect the accurate usage rates as well as any other section which are affected by this error.

Response to Comment 11:

Condition A.2(2) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (2) One (1) paper machine, identified as Unit No. 2, with a maximum process weight rate of ~~ten (10)~~ **12.5** tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a} , S_{4b} , S_{4c} , and S_{4d});

The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (2) One (1) paper machine, identified as Unit No. 2, with a maximum process weight rate of ~~ten (10)~~ **12.5** tons per hour (ton/hr), exhausting to four (4) stacks (S_{4a} , S_{4b} , S_{4c} , and S_{4d}).

Condition D.2.1 "Particulate Matter" has been changed to be as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the one (1) paper machine at the process weight rate of ~~40~~ **12.5** ton/hr, shall not exceed ~~49.2~~ **22.26** pounds per hour emission rate established in the following formula:

Comment 12:

Technical Support Document, State Rule Applicability - Individual Facilities, 326 IAC 6-2-3 (Particulate Emissions for Indirect Heating Sources), Page 9 of 15. Calculations were provided in this section to compare actual fuel particulate emission rates (based on AP-42 emission factors) to the particulate limitation of 0.64 lb/mmBtu which covers the boiler. A calculation was shown for each of the three (3)

types of fuels the boiler is capable of burning and it was determined that the facility can comply burning of the three (3) fuels. A mathematical error was identified in the computation for natural gas. The calculation indicated that natural gas will produce 0.052 lbs of particulate per mmBtu. Rock-Tenn requests the calculation be corrected to illustrate: $13.7 \text{ lbs/MMCF} \div 1,008 \text{ mmBtu/MMCF} = 0.014 \text{ lbs/mmBtu}$.

Response to Comment 12:

The original Technical Support Document is not physically changed after Public Notice. However, the change is noted in this Addendum to the Technical Support Document which documents the correction. None of the Part 70 Permit conditions have been changed as a result of this corrected calculation.

Comment 13:

Technical Support Document, State Rule Applicability - Individual Facilities, 326 IAC 8-2-5 (Paper Coating Facilities), Page 10 of 15. Under the discussion for applicability to 326 IAC 8-2-5 (Paper Coating Operations), the first paragraph explains that the one (1) paper machine (emission unit #2) is not applicable to 326 IAC 8-2-5 (paper coating RACT rule) because the potential volatile organic compound emissions are less than one hundred tons per year and Rock-Tenn is not located in one of the listed existing counties. The paper machine, emission unit #2, is not engaged in web coating or paper saturation processes (paper coating) and therefore, the language is misleading. Although the rule was determined to be not applicable to the paper machine for other reasons, Rock-Tenn requests that this paragraph be removed for the applicability section OR that the non-applicability justification also indicate that the paper machine does not perform the process/activities covered by the regulation.

Response to Comment 13:

The original Technical Support Document is not physically changed after Public Notice. However, the change is noted in this Addendum to the Technical Support Document which documents the correction. None of the Part 70 Permit conditions have been changed as a result of this corrected explanation.

Upon further review, OAM has made the following changes to the Technical Support Document (TSD) and Part 70 Permit.

1. The Federal Rule Applicability of the Technical Support Document (page 6 of 15) has been changed to add the following statement (bold added for emphasis):
 - (b) The 75 million British thermal units per hour boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db), because **the heat input capacity is less than one hundred million British thermal units per hour and because** the boiler was constructed in 1969 which is prior to the June 19, 1984 applicability date. The 75 million British thermal units per hour boiler was issued a Construction Permit (CP 035-5202-00041) on June 13, 1996, to change the main fuel from natural gas to fuel oil no. 6. This change does not constitute a modification, pursuant to 40 CFR 60.14.

The statement is not physically changed on the Technical Support Document (TSD) because it cannot be changed after public notice. However, the change is noted here.

2. Condition A.5 "Prior Permit Conditions Superseded" has been changed to be as follows:

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the ~~effective date~~ **date of issuance** of this permit. All terms and conditions in such registrations and permits are no longer in effect.

3. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

4. Condition B.11(a) "Annual Compliance Certification" has been changed to be as follows:

- (a) The Permittee shall annually ~~certify that the source has complied~~ **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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

5. Condition B.13(b)(5) "Emergency Provisions" has been changed to be as follows:

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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 the certification by the "responsible official" as defined by ~~326 IAC 2-7-1(33)~~ **326 IAC 2-7-1(34)**.

6. Condition B.24(b) "Operational Flexibility" has been changed to be as follows:

- (b) 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 by the Permittee does not require the certification by the "responsible official" as defined by ~~326 IAC 2-7-1(33)~~ **326 IAC 2-7-1(34)**.

7. Condition B.28(c) "Annual Fee Payment" has been changed to be as follows:

- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or ~~317-233-5674~~ **317-233-0425** (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

8. Condition C.1 "PSD Minor Source Status" has been changed to be as follows::

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

- ~~(a) The total source potential emissions of Sulfur Dioxide (SO₂) and Nitrogen Oxide (NO_x) are limited to less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
- ~~(b) This status includes those activities at the source that are considered insignificant activities.~~
- ~~(c) The source shall be allowed to add insignificant activities, as listed in 326 IAC 2-7-1(20), not already in this permit provided any modification that would lead to an increase in allowable emissions greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to the New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur. tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

9. Condition C.2 "Opacity" has been changed to be as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

~~This condition is not federally enforceable.~~

10. Condition C.3 "Open Burning" has been changed to be as follows:

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.

~~This condition is not federally enforceable.~~ **326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

11. Condition C.4 "Incineration" has been changed to be as follows:

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

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. ~~This condition is not federally enforceable.~~

12. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

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). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

13. The rule cite in Condition C.8 "Performance Testing" and subsection (b) has been changed from (bold added for emphasis):

C.8 Performance Testing [~~326 IAC 3-2-1~~][326 IAC 3-6]

(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 ~~with~~ **within** five (5) days prior to the end of the initial forty-five (45) day period.

14. Condition C.9(a) "Compliance Schedule" has been changed to be as follows:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; **and**

15. Condition C.17(a) "Emission Statement" has been changed to be as follows:

(a) The Permittee shall submit a certified, annual emission statement that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) ~~Contain~~ **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) ~~Contain~~ **Indicate** actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

16. Condition D.1.4 "Preventive Maintenance Plan" has been changed to be as follows:

D.1.4 Preventive Maintenance Plan [~~326 IAC 2-7-4(e)(9)~~][326 IAC 2-7-5(13)]

17. Condition D.1.8(b) "Record Keeping Requirements" has been changed from (bold added for emphasis):

(b) To document compliance with Condition ~~D.1.3~~ **D.1.7**, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.

18. Condition D.2.3 "Monitoring" has been changed to be as follows:

D.2.3 ~~Monitoring~~ Visible Emissions Notations

~~Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.~~

- (a) **Daily visible emission notations of the one (1) line machine stack exhausts shall be performed during normal daylight operations. 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) **The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

19. Condition D.2.4 "Record Keeping Requirements" has been added to the permit as follows:

D.2.4 Record Keeping Requirements

To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the one (1) line machine stack exhausts.

20. Condition D.4.1 "Volatile Organic Compound" has been changed to be as follows:

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8]

Any change or modification to this facility that would lead to an increase in any criteria pollutant emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 ~~shall be subject to New Source Review, will require a Best Available Control Technology (BACT) analysis and~~ must be approved by the Office of Air Management (OAM) before such change or modification can occur.

21. Condition D.5.2 "Volatile Organic Compound" has been change to be as follows:

D.5.2 Volatile Organic Compound (VOC) [326 IAC 8]

Any change or modification to this facility that would lead to an increase in any criteria pollutant emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 ~~shall be subject to New Source Review, will require a Best Available Control Technology (BACT) analysis and~~ must be approved by the Office of Air Management (OAM) before such change or modification can occur.

22. Condition D.5.4(c) "Monitoring" has been changed to be as follows:

- (c) Additional inspections and preventive measures shall be performed as prescribed in the ~~Preventive Maintenance~~ **Compliance Response Plan**.

23. Condition D.5.5(b) "Record Keeping Requirements" has been changed to be as follows:

- (b) To document compliance with Condition ~~D.5.4~~ **D.5.4**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the ~~Preventive Maintenance~~ **Compliance Response Plan**.

24. Conditions D.2.2, D.3.2, D.4.2, D.5.3, D.6.2 "Preventive Maintenance Plan" have been deleted

due to the fact that these conditions are no longer necessary for this equipment.

25. The fax number on the Emergency/Deviation Occurrence Form was changed from (317) 233-6865 to (317) 233-5967.