



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Source Operating Permit (MSOP)

for Graphic Packaging International-Auburn in DeKalb County

MSOP No.: M033-42870-00131

The Indiana Department of Environmental Management (IDEM) has received an application from Graphic Packaging International-Auburn, located at 1201 South Grandstaff Drive, Auburn, IN 46706, for a MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Graphic Packaging International-Auburn to continue to operate its existing source.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

IDEM is aware that the operation a folding carton and paperboard-based filter frame manufacturing plant has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Eckhart Public Library
603 South Jackson Street
Auburn, IN 46706

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 033-42870-00131 in all correspondence.

Comments should be sent to:

Paul Jump
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Paul Jump or (317) 234-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Paul Jump
E-mail: pjump@idem.IN.gov

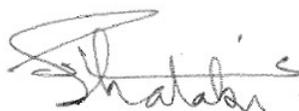
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Paul Jump or my staff at the above address.



Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 N. Senate Avenue • Indianapolis, IN 46204

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

Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**Graphic Packaging International-Auburn
1201 South Grandstaff Drive
Auburn, Indiana 46706**

(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 to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M033-42870-00131	
Master Agency Interest ID: 1108	
Issued by:	Issuance Date:
Ghassan Shalabi, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary folding carton and paperboard-based filter frame manufacturing plant.

Source Address:	1201 South Grandstaff Drive, Auburn, Indiana 46706
General Source Phone Number:	260-347-7608
SIC Code:	2657(Folding Paperboard Boxes, Including Sanitary)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Jet Web Offset Press (9 color), identified as P001, constructed in 2015, with a maximum capacity of 1,230 feet per minute, using no controls, and exhausting to stack S001.
- (b) One (1) Web 2 Flexo Press (9 color), identified as P002, constructed in 2002, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S002.
- (c) One (1) Web 3 Flexo Press (8 color), identified as P003, constructed in 1995, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S003.
- (d) One (1) Web 4 Flexo Press (9 color), identified as P004, constructed in 2015, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S004a and S004b.
- (e) One (1) Platemaking Operation, identified as PM001, installed in 2015, with a maximum plate solution usage of 2,220 gallons per year, combined, using no controls, and exhausting indoors.
- (f) One (1) natural gas-fired press 2 dryer, identified as CU001, constructed in 2002, with a maximum capacity of 1.25 MMBtu per hour, using no controls, and exhausting to stack S002.
- (g) One (1) natural gas-fired press 3 dryer, identified as CU002, constructed in 1995, with a maximum capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stack S003.

- (h) One (1) natural gas-fired press 4 dryer, identified as CU003, constructed in 2015, with a maximum capacity of 1.65 MMBtu per hour, using no controls, and exhausting to stack S004a and S004b.
- (i) One (1) natural gas-fired Ray Pack Boiler, identified as CU004, constructed in 1986, with a maximum capacity of 0.035 MMBtu per hour, using no controls, and exhausting to roof vent outside.
- (j) One (1) natural gas-fired AO Smith Water Heater, identified as CU005, constructed in 2015, with a maximum capacity of 0.04 MMBtu per hour, using no controls, and exhausting to roof vent outside.
- (k) One (1) gluing machine, identified as G001, constructed in 1994, with a maximum capacity of 13,200 cartons per hour, using no controls, and exhausting indoors.
- (l) One (1) gluing machine, identified as G002, constructed in 1986, with a maximum capacity of 10,700 cartons per hour, using no controls, and exhausting indoors.
- (m) One (1) gluing machine, identified as G003, constructed in 2016, with a maximum capacity of 11,800 cartons per hour, using no controls, and exhausting indoors.
- (n) One (1) gluing machine, identified as G004, constructed in 2016, with a maximum capacity of 9,800 cartons per hour, using no controls, and exhausting indoors.
- (o) One (1) gluing machine, identified as G005, constructed in 2016, with a maximum capacity of 8,000 cartons per hour, using no controls, and exhausting indoors.
- (p) One (1) Scrap Processing System, consisting of two (2) balers, identified as SBALER, constructed in 1989 and 2014, with a maximum capacity of 5.6 tons of scrap per hour, total, using a baghouse as control, and exhausting indoors.
- (q) One (1) ink mixing station, identified as IM001, constructed in 2015, with a maximum capacity of 960 pounds per hour, using no controls, and exhausting indoors.
- (r) One (1) parts washer, identified as PW001, constructed in 2014, with a maximum usage rate of 20 gallons per year, using no controls, and exhausting indoors.
- (s) Paved roads.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M033-42870-00131, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [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 (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M033-42870-00131 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 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).

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (i) One (1) natural gas-fired Ray Pack Boiler, identified as CU004, constructed in 1986, with a maximum capacity of 0.035 MMBtu per hour, using no controls, and exhausting to roof vent outside.
- (j) One (1) natural gas-fired AO Smith Water Heater, identified as CU005, constructed in 2015, with a maximum capacity of 0.04 MMBtu per hour, using no controls, and exhausting to roof vent outside.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to the PM emission limit (Pt) in pounds per MMBtu heat input as specified in the following table:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Boiler	CU004	0.6
Water Heater	CU005	0.6

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (r) One (1) parts washer, identified as PW001, constructed in 2014, with a maximum usage rate of 20 gallons per year, using no controls, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:

- (A) must be a solid, fluid stream; and
- (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Jet Web Offset Press (9 color), identified as P001, constructed in 2015, with a maximum capacity of 1,230 feet per minute, using no controls, and exhausting to stack S001.
- (b) One (1) Web 2 Flexo Press (9 color), identified as P002, constructed in 2002, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S002.
- (c) One (1) Web 3 Flexo Press (8 color), identified as P003, constructed in 1995, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S003.
- (d) One (1) Web 4 Flexo Press (9 color), identified as P004, constructed in 2015, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S004a and S004b.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not discharge into the atmosphere any volatile organic compound (VOC) in excess of thirty five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon) each, excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2 6.1 5(a)(2)]

D.3.4 Record Keeping Requirements

- (a) To document compliance with condition D.3.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limit established in condition D.3.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Graphic Packaging International-Auburn
Source Address:	1201 South Grandstaff Drive
City:	Auburn, Indiana 46706
Phone #:	260-347-7608
MSOP #:	M033-42870-00131

I hereby certify that Graphic Packaging International-Auburn is: still in operation.

no longer in operation.

I hereby certify that Graphic Packaging International-Auburn is: in compliance with the requirements of MSOP M033-42870-00131.

not in compliance with the requirements of MSOP M033-42870-00131.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**Technical Support Document (TSD) for a Minor Source Operating Permit
(MSOP)**

Source Description and Location

Source Name:	Graphic Packaging International-Auburn
Source Location:	1201 South Grandstaff Drive, Auburn, IN 46706
County:	DeKalb
SIC Code:	2657 (Folding Paperboard Boxes, Including Sanitary)
Operation Permit No.:	M 033-42870-00131
Permit Reviewer:	Paul Jump

On May 15, 2020, the Office of Air Quality (OAQ) received an application from Graphic Packaging International-Auburn related to the operation of an existing stationary folding carton and paperboard-based filter frame manufacturing plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
DeKalb County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
DeKalb County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Graphic Packaging International-Auburn on May 15, 2020, relating to the operation a folding carton and paperboard-based filter frame manufacturing plant.

The following emission units that were constructed and/or operated without a permit:

- (a) One (1) Jet Web Offset Press (9 color), identified as P001, constructed in 2015, with a maximum capacity of 1,230 feet per minute, using no controls, and exhausting to stack S001.
- (b) One (1) Web 2 Flexo Press (9 color), identified as P002, constructed in 2002, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S002.
- (c) One (1) Web 3 Flexo Press (8 color), identified as P003, constructed in 1995, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S003.
- (d) One (1) Web 4 Flexo Press (9 color), identified as P004, constructed in 2015, with a maximum capacity of 550 feet per minute, using no controls, and exhausting to stack S004a and S004b.
- (e) One (1) Platemaking Operation, identified as PM001, installed in 2015, with a maximum plate solution usage of 2,220 gallons per year, combined, using no controls, and exhausting indoors.
- (f) One (1) natural gas-fired press 2 dryer, identified as CU001, constructed in 2002, with a maximum capacity of 1.25 MMBtu per hour, using no controls, and exhausting to stack S002.

- (g) One (1) natural gas-fired press 3 dryer, identified as CU002, constructed in 1995, with a maximum capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stack S003.
- (h) One (1) natural gas-fired press 4 dryer, identified as CU003, constructed in 2015, with a maximum capacity of 1.65 MMBtu per hour, using no controls, and exhausting to stack S004a and S004b.
- (i) One (1) natural gas-fired Ray Pack Boiler, identified as CU004, constructed in 1986, with a maximum capacity of 0.035 MMBtu per hour, using no controls, and exhausting to roof vent outside.
- (j) One (1) natural gas-fired AO Smith Water Heater, identified as CU005, constructed in 2015, with a maximum capacity of 0.04 MMBtu per hour, using no controls, and exhausting to roof vent outside.
- (k) One (1) gluing machine, identified as G001, constructed in 1994, with a maximum capacity of 13,200 cartons per hour, using no controls, and exhausting indoors.
- (l) One (1) gluing machine, identified as G002, constructed in 1986, with a maximum capacity of 10,700 cartons per hour, using no controls, and exhausting indoors.
- (m) One (1) gluing machine, identified as G003, constructed in 2016, with a maximum capacity of 11,800 cartons per hour, using no controls, and exhausting indoors.
- (n) One (1) gluing machine, identified as G004, constructed in 2016, with a maximum capacity of 9,800 cartons per hour, using no controls, and exhausting indoors.
- (o) One (1) gluing machine, identified as G005, constructed in 2016, with a maximum capacity of 8,000 cartons per hour, using no controls, and exhausting indoors.
- (p) One (1) Scrap Processing System, consisting of two (2) balers, identified as SBALER, constructed in 1989 and 2014, with a maximum capacity of 5.6 tons of scrap per hour, total, using a baghouse as control, and exhausting indoors.
- (q) One (1) ink mixing station, identified as IM001, constructed in 2015, with a maximum capacity of 960 pounds per hour, using no controls, and exhausting indoors.
- (r) One (1) parts washer, identified as PW001, constructed in 2014, with a maximum usage rate of 20 gallons per year, using no controls, and exhausting indoors.
- (s) Paved roads.

Enforcement Issues

IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and/or operating rules.

Emission Calculations

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

Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions (ton/year)							Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	
Total PTE of Entire Source Excluding Fugitives*	2.41	0.74	0.19	0.01	1.92	82.41	1.61	2.79
Title V Major Source Thresholds	--	100	100	100	100	100	100	25
Total PTE of Entire Source Including Source-Wide Fugitives*	3.23	0.90	0.23	0.01	1.92	82.41	1.61	2.79
MSOP Thresholds	25	25	25	25	25	25	100	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
 *Fugitive HAP emissions are always included in the source-wide emissions.

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the one (1) natural gas-fired Ray Pack Boiler, identified as CU004, and the one (1) natural gas-fired AO Smith Water Heater, identified as CU005, because they have maximum design heat input capacity of less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for four (4) presses, identified as P001, P002, P003, and P004, because the emission units are not Publication Rotogravure printing presses, as defined in 40 CFR 60.431, and since

the emission units are not used to print on saleable paper products such as catalogues, advertisements, magazines, newspapers, periodicals, and telephone directories.

- (c) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T and 326 IAC 20-6 are not included in the permit for the parts washer, since the unit does not use halogenated solvents.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK and 326 IAC 20-18 are not included in the permit for the four (4) presses, identified as P001, P002, P003, and P004, since the source is not major for HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ and 326 IAC 20-65 are not included in the permit for the four (4) presses, identified as P001, P002, P003, and P004, since the source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for the one (1) natural gas-fired Ray Pack Boiler, identified as CU004, and the one (1) natural gas-fired AO Smith Water Heater, identified as CU005, since the source is not major.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for the one (1) natural gas-fired Ray Pack Boiler, identified as CU004, one (1) natural gas-fired AO Smith Water Heater, identified as CU005, since both units are gas-fired as defined in 63.11237.
- (f) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

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

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

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an

operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in DeKalb County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in DeKalb County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

Printing Presses

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these units were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

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

Pursuant to 326 IAC 8-2-1(a)(4) (Applicability), the rules contained in 326 IAC 8-2-5 (Paper Coating Operations) apply to paper coating facilities, construction of which commences after July 1, 1990 and that have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The Printing Presses, identified as P001, P002, P003, and P004, are subject to the provisions of this rule since the potential VOC emissions from each Printing Press are greater than fifteen (15) pounds of VOC per day before add-on controls.

326 IAC 8-5-5 (Graphic Arts Operations)

The requirements of 326 IAC 8-5-5 (Graphic Arts Operations) apply to flexographic printing sources constructed after November 1, 1980, located anywhere in the state, with potential emissions of VOC greater than twenty-five (25) tons per year. The Printing Presses, identified as P001, P002, P003, and

P004, are not subject to the provisions of this rule since the potential VOC emissions from each Printing Press are less than twenty-five (25) tons per year.

326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)

Pursuant to 326 IAC 8-16-1 (Applicability), the requirements of 326 IAC 8-16 (Offset Lithographic and Letterpress Printing) apply to sources located in Lake or Porter County. The Printing Presses, identified as P001, P002, P003, and P004, are not subject to the provisions of this rule since the Printing Presses, identified as P001, P002, P003, and P004, are not located in Lake or Porter County.

Platemaking Operation

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this unit was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Natural Gas Combustion

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

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

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

Where:

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

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Boiler CU004	1986	0.035	0.075	2.14	0.6	0.002
Water Heater CU005	2015	0.04		2.14	0.6	0.002

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						
Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.						

The press dryers, identified as Press Dryer 2-4, are direct fired units and therefore they are not subject to 326 IAC 6-2-4.

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

Each natural gas-fired combustion unit is exempt from the requirements of 326 IAC 6-3, because pursuant to 326 IAC 1-2-59(a), liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

These emission units are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these units were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the units, since these units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Gluing Machines

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these units were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

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

Pursuant to 326 IAC 8-2-1(a)(4) (Applicability), the rules contained in 326 IAC 8-2-5 (Paper Coating Operations) apply to paper coating facilities, construction of which commences after July 1, 1990 and that have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The five (5) gluing machines, identified as G001, G002, G003, G004, and G005, are not subject to the provisions of this rule since the potential VOC emissions from each gluing machine is less than fifteen (15) pounds of VOC per day.

Scrap Processing Operation

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

Pursuant to 326 IAC 6-3-1(b)(14), the one (1) Scrap Processing System is not subject to the requirements of 326 IAC 6-3, since Manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Ink Mixing Operation

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this unit was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Parts Washer

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the one (1) parts washer was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions is less than twenty-five (25) tons per year.

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1, the one (1) parts washer is subject to the requirements of 326 IAC 8-3-2, because it is a cold cleaner degreaser that was constructed after July 1, 1990.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-1(c)(3), the one (1) parts washers is subject to the requirements of 326 IAC 8-3-8(b), since the source uses solvent in the cold cleaner degreasers.

Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 15, 2020.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 033-42870-00131. The staff recommends to the Commissioner that the MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Paul Jump, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**TSD Appendix A: Emission Calculations
Emissions Summary**

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs
Jet Web Offset Press 9 color (P001)	-	-	-	-	-	24.61	-	2.61
Web 2 Flexo Press 9 color (P002)	-	-	-	-	-	19.75	-	-
Web 3 Flexo Press 8 color (P003)	-	-	-	-	-	13.02	-	-
Web 4 Flexo Press 9 color (P004)	-	-	-	-	-	24.14	-	-
Plate Making	-	-	-	-	-	0.15	-	0.01
Natural Gas-Fired Units	0.04	0.15	0.15	0.01	1.92	0.11	1.61	0.04
Gluing Machines (G001 -G005)						0.47	-	0.14
Baler System	2.37	0.59	0.05	-	-	-	-	-
Ink Mixing (IM001)	-	-	-	-	-	1.28E-01	-	-
Parts Washer						3.28E-02	-	-
Total PTE of Entire Source Excluding Fugitives	2.41	0.74	0.19	0.01	1.92	82.41	1.61	2.79
<i>Fugitive Emissions</i>								
<i>Paved Roads</i>	<i>0.83</i>	<i>0.17</i>	<i>0.04</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>
Total PTE of Entire Source Including Source-Wide Fugitives	3.23	0.90	0.23	0.01	1.92	82.41	1.61	2.79

TSD Appendix A: Emission Calculations
Offset Lithographic / Flexographic Printing VOC

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Source ID	Emission Unit	Web Width (in)	Web Width (ft)	Max Line Speed (ft/min)	Web Rate	Potential Annual Hours of Printing and/or Coating ^b	Web Rate	Number of Print Stations	Type of Material Applied or Used	Maximum Web Coverage ^c	Material Usage Factor ^d	Units	Maximum Material Usage Rate		Material VOC Content ^e	Mass of VOC Applied to Sheet		Potential VOC Emission Rate ^f	
					(ft ² /hr)	(hr/yr)	(ft ² /yr)						(lb/hr)	(lb/yr)		(wt%)	(lb/hr)	(lb/yr)	(lb/hr)
P001	Jet Web Offset Press 9 color (6 color EB Offset and 3 color Flexo)	33.4	2.78	1,230	205,410	6,240	1,281,758,400	6	Lithographic EB Ink	90%	0.0001	lb/ft ² print area	26.62	166,116	0.28%	0.07	463	0.07	0.23
								--	Lithographic Coating	90%	0.0006	lb/ft ² print area	110.92	692,150	0.17%	0.18	1,147	0.18	0.57
								3	Flexographic Ink	90%	0.0003	lb/ft ² print area	59.16	369,146	3.5%	2.07	12,920	2.07	6.46
								--	Fountain Solution	--	0.20	lb/lb ink applied	5.32	33,223	38.37%	2.04	12,748	2.04	6.37
								--	Litho Wash Materials	--	0.12	lb/lb ink applied	3.19	19,934	99%	3.16	19,735	3.16	9.87
								--	Flexo Wash Materials	--	0.12	lb/lb ink applied	3.19	44,298	5%	0.16	2,215	0.16	1.11
P001 Total =																7.69	24.6		

Notes:

^a Machine capacity (ft²/hr) is used to develop hourly emission estimates. Unless otherwise stated, annual emissions assume continuous operation throughout the year.

^b Press potential operating times assume that over the course of a year, approximately 70% of time is dedicated to printing, 20% to make-readies in order to ready the press between print runs, and 10% to press between print runs.

^c Maximum web coverage assumes coating/printing over the portion of the web as shown.

^d Material usage factors for the lithographic ink, coating, flexographic ink, fountain solution, and wash materials are derived from historic operating data from offset lithographic printing operations at similar GPI facilities. Specifically, the emissions factor for Lithographic Ink is 0.0000286 lbs per ft² print area per number of color printing stations. For a 6 color printing unit, the emissions factor is 0.00017 lbs per ft² print area. Similarly, the emission factor for Flexographic Ink is 0.0008559 lb per ft² print area for press with 8 printing stations. For a 3 color printing unit, the emission factor is 0.00032 lb per ft² print area.

^e Ink and coating are not thinned, so material VOC content equals as-applied VOC content. Fountain solution concentrate is diluted with water before use. Values shown are based on consumption of fountain solution concentrate.

^f As the lithographic inks are cured via electronic beam, there is no retention factor applied as suggested in Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, September 2006). In addition, blanket/roller wash emissions conservatively do not apply a retention factor to account for material retained in shop towels used for press washing operations.

Equations:

- 1) Maximum material usage rate (lithographic ink, coating, and flexographic ink) (lb/hr) = Maximum Web Rate (ft²/hr) x Material Usage Factor (lb/ft²) x Maximum Sheet Coverage (%)
- 2) Maximum material usage rate (fountain solution or wash material) (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor (lb/lb ink)
- 3) Mass of VOC Applied to Sheet (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)
- 4) VOC Emission Rate (lb/hr) = Mass of VOC applied to sheet (lb/hr)

TSD Appendix A: Emission Calculations
 Offset Lithographic / Flexographic Printing HAPs
 Company Name: Graphic Packaging International-Auburn
 Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
 Permit Number: M033-42870-00131
 Reviewer: Paul Jump

Source ID	Emission Unit	Type of Material Applied or Used	Maximum Material Usage Rate ^a		1,4-Dioxane Content	Benzene Content	Cumene Content	Diethanolamine Content	Ethylbenzene Content	Ethylene Glycol Content	Naphthalene Content	N-Nitrosodimethylamine Content	Toluene Content	Xylene Content	Potential HAP Emission Rate	1,4-Dioxane Emissions		Benzene Emissions		Cumene Emissions		Diethanolamine Emissions		Ethylbenzene Emissions		Ethylene Glycol Emissions		Naphthalene Emissions		N-Nitrosodimethylamine Emissions		Toluene Emissions		Xylene Emissions			
			lb/hr	lb/yr												lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr
P001	Jet Web Offset Press # color (6 color EB Offset and 5 color Flex)	Lithographic Ink	55.62	166,116	--	--	--	--	--	--	--	--	--	--	0.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
		Lithographic Coating	110.62	342,150	--	--	--	--	--	--	--	--	--	--	0.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
		Flexographic Ink	19.16	59,146	--	--	--	--	--	--	--	--	--	--	--	0.03	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
		Fluxant Solution	5.32	16,223	0.01%	--	--	--	--	--	7.50%	--	--	0.01%	--	0.40	1.25	0.0005	0.002	--	--	--	--	--	--	0.40	1.25	--	--	0.001	0.002	--	--	0.0004	0.001	--	--
	Litho Wash Material	3.19	9,834	--	0.01%	--	--	--	0.01%	--	--	0.01%	--	0.00	0.00	--	--	0.0004	0.001	--	--	--	--	0.0004	0.001	--	--	0.00	0.00	--	--	0.0004	0.001	--	--	--	
	Press Wash Material	3.19	9,834	--	--	1.00%	0.01%	1.00%	0.10%	0.10%	--	1.00%	--	0.20	1.30	--	--	--	--	0.03	0.22	0.0003	0.002	0.03	0.22	0.00	0.02	0.10	0.65	--	--	--	--	0.03	0.22		
P001 Total =															0.60	2.61	0.002	0.001	0.22	0.002	0.22	1.27	0.67	0.002	0.001	0.22											

Notes:
^a Calculated on the "Litho VOC" tab.
^b HAP wt% used is the average %HAP from the SDS.

**TSD Appendix A: Emission Calculations
Flexographic Printing**

**Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump**

Source ID	Emission Unit	Max Operating Hours ^a (hr/yr)	Web Width ^b (ft)	Maximum Press Speed (ft/min)	Web Rate ^c (ft ² /hr)	Number of Print Stations
P002	Web 2 Flexo Press 9 color	6,240	3.75	550	123,750	9
P003	Web 3 Flexo Press 8 color	6,240	2.67	550	88,000	8
P004	Web 4 Flexo Press 9 color	6,240	4.58	550	151,250	9

Source ID	Max Operating Hours (hr/yr)	Press-ready Application Rate ^d (lb/ft ²)	Units	VOC Wt%	Maximum Material Usage ^e (lb/hr)	Material Usage (lbs/yr)	Potential VOC Emissions	
							(lb/hr)	(tpy)
P002 - Ink	6,240	0.00096	lb/ft ²	3.50%	118.80	741,312	4.16	12.97
Flexo Coating	6,240	0.0006	lb/ft ²	2.54%	74.25	463,320	1.89	5.88
Fugitive Cleaning	2,520	0.12	lb/lb ink	5.00%	14.26	35,925	0.71	0.90
P002 Total =							6.76	19.75
P003 - Ink	6,240	0.00086	lb/ft ²	3.50%	75.68	472,243	2.65	8.26
Flexo Coating	6,240	0.0006	lb/ft ²	2.54%	52.80	329,472	1.34	4.18
Fugitive Cleaning	2,520	0.12	lb/lb ink	5.00%	9.08	22,886	0.45	0.57
P003 Total =							4.44	13.02
P004 - Ink	6,240	0.00096	lb/ft ²	3.50%	145.20	906,048	5.08	15.86
Flexo Coating	6,240	0.0006	lb/ft ²	2.54%	90.75	566,280	2.30	7.19
Fugitive Cleaning	2,520	0.12	lb/lb ink	5.00%	17.42	43,908	0.87	1.10
P004 Total =							8.26	24.14
Total Flexographic Printing VOCs (tons/yr) =							6.76 + 4.44 + 8.26 =	19.75 + 13.02 + 24.14 =
							19.46	56.92

Notes:

^a Press potential operating times assume that over the course of a year, approximately 70% of time is dedicated to printing, 20% to make-readies in order to ready the press between print runs, and 10% to press between print runs.

^b Web 2 Flexo Press has a maximum web width of 45"; Web 3 Flexo Press has a maximum web width of 32"; and, Web 4 Flexo Press has a maximum width of 55".

^c Based on the maximum capacity of press.

^d Based on application rate at similar flexographic printing operations at other GPI facilities adjusted for number of printing stations.

^e Flexo coating and cleaning material usage factors are based on similar flexographic printing operations at other GPI facilities adjusted for number of printing stations.

Equations:

- 1) Maximum ink usage rate (lb/hr) = Web Rate (ft²/hr) x Material Usage Factor (lb/ft²)
- 2) Maximum coating usage rate (lb/hr) = Web Rate (ft²/hr) x Material Usage Factor (lb/ft²)
- 3) Maximum cleaner usage rate (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor
- 4) VOC Emission Rate (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)

**TSD Appendix A: Emission Calculations
Plate Making VOCs**

**Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump**

Source ID	Material	Maximum Usage Rate ^a (gal/yr)	Density (lbs/gal)	VOC (wt%)	VOC ^b (lb/gal)	Potential VOC Emissions ^{c,d}	
						(lbs/hr)	(ton/yr)
PM001	Plate developer	1,200	8.59	0%	0	0	0
	Plate finisher	300	9.17	2.7%	0.25	0.01	0.04
	Remover	180	8.34	15%	1.25	0.04	0.11
	Replenisher	540	10.84	0%	0	0	0
		2,220			Total VOC emissions =	0.05	0.15

Notes:

^a Maximum usage of each plate room material is scaled from past operating data, assuming that each press operates at its design capacity.

^b VOC content and specific gravity are taken from SDS information. See Table B-9 for HAP emissions from the remover.

^c Annual VOC emissions are calculated assuming that the entirety of volatile content is emitted during use.

^d Short-term emissions are calculated assuming maximum usage occurs over a the following work schedule (hr/yr):

6,240

Equations:

- 1) $\text{VOC (lbs/gallon)} = \text{Density (lbs/gal)} \times \text{VOC (wt\%)}$
- 2) $\text{Potential VOC Emissions (lbs/hr)} = \text{VOC (lbs/gallon)} \times \text{Max. Usage Rate (gallons/yr)} / \text{Max Operating Hours (hr/yr)}$
- 3) $\text{Potential VOC Emissions (tons/yr)} = \text{Potential VOC Emissions (lbs/hr)} \times \text{Max Operating Hours (hr/yr)} \times 1 \text{ ton}/2000 \text{ lbs}$

**TSD Appendix A: Emission Calculations
Plate Making HAPs**

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Source ID	Material	Maximum Usage Rate ^a (gal/yr)	Density (lbs/gal)	HAP (wt%)			HAP ^b (lb/gal)			Potential HAP Emissions ^{c,d}					
				Cumene	Ethylbenzene	Xylene	Cumene	Ethylbenzene	Xylene	Cumene (lbs/hr)	Cumene (ton/yr)	Ethylbenzene (lbs/hr)	Ethylbenzene (ton/yr)	Xylene (lbs/hr)	Xylene (ton/yr)
PM001	Remover	180	8.34	1.00%	1.00%	1.00%	0.08	0.08	0.08	0.002	0.01	0.0001	0.0003	0.0001	0.0003

Total HAP emissions = 0.003 0.01

Notes:

^a Maximum usage of each plate room material is scaled from past operating data, assuming that each press operates at its design capacity.

^b HAP content and specific gravity are taken from SDS information. The plate developer, finisher, and replenisher do not have HAPs.

^c Annual HAP emissions are calculated assuming that the entirety of volatile content is emitted during use.

^d Short-term emissions are calculated assuming maximum usage occurs over a the following work schedule (hr/yr):

6,240

Equations:

- HAP Content (lbs/gallon) = Density (lbs/gal) x HAP (wt%)
- Potential HAP Emissions (lbs/hr) = HAP (lbs/gallon) x Max. Usage Rate (gallons/yr) / Max Operating Hours (hr/yr)
- Potential HAP Emissions (tons/yr) = Potential HAP Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
4.5	1020	38.4

Emission Unit ID	Description	MMBtu/hr
CU001	Press Dryer 2	1.25
CU002	Press Dryer 3	1.5
CU003	Press Dryer 4	1.65
CU004	Ray Pack Boiler	0.035
CU005	AO Smith Water Heater	0.04
Total		4.475

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.04	0.15	0.15	0.01	1.92	0.11	1.61

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	4.0E-05	2.3E-05	1.4E-03	0.03	6.5E-05	0.04

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.6E-06	2.1E-05	2.7E-05	7.3E-06	4.0E-05	1.1E-04
						Total HAPs
						0.04
						Worst HAP
						0.03

Methodology is the same as above.

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

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

**TSD Appendix A: Emission Calculations
Gluing Machines**

**Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump**

Source ID	Emission Unit	Maximum Throughput ^a (cartons/hr)	Maximum Throughput (cartons/yr)	Max Operating Hours (hr/yr)	Adhesive				VOC		HAP (Vinyl Acetate)		
					Application Rate ^b			Maximum VOC Content ^c	Maximum HAP Content ^c	Potential Emissions ^{d,e}		Potential Emissions ^{d,e}	
					(lb/1,000 cartons)	(lb/hr)	(ton/yr)	(%)	(%)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
G001	Gluer 1	13,200	115,632,000	8,760	0.2	2.6	11.6	1.00%	0.30%	0.03	0.12	0.008	0.03
G002	Gluer 2	10,700	93,732,000	8,760	0.2	2.1	9.4	1.00%	0.30%	0.02	0.09	0.006	0.03
G003	Gluer 3	11,800	103,368,000	8,760	0.2	2.4	10.3	1.00%	0.30%	0.02	0.10	0.007	0.03
G004	Gluer 4	9,800	85,848,000	8,760	0.2	2.0	8.6	1.00%	0.30%	0.02	0.09	0.006	0.03
G005	Gluer 5	8,000	70,080,000	8,760	0.2	1.6	7.0	1.00%	0.30%	0.02	0.07	0.005	0.02
Total emissions =										0.11	0.5	0.03	0.1

Notes:^a Gluer machine throughputs are taken from facility personnel.^b Glue application factor is derived from historic operating data from the gluing operations at similar GPI facilities.^c A 1% VOC content and 0.3% HAP content were taken from a similar GPI facility to represent the worst case that can be expected across the range of adhesives that can be used.^d Maximum hourly emissions estimated by multiplying VOC and HAP content, respectively, by the material usage rate assuming that all volatiles are emitted during use.^e The worst-case VOC and HAP emission estimates conservatively assume continuous operation throughout the year.**Equations:**

1) Adhesive application rate (lb/hr) = Maximum Throughput (1,000 carton/hr) x Application rate (lb/1,000 cartons)

2) Total VOC Emissions (lb VOC/hr) = Maximum Adhesive Application Rate (lb/hr) x VOC Content (%)

3) HAP Emissions (lb VOC/hr) = Maximum Adhesive Application Rate (lb/hr) x HAP Content (%)

**TSD Appendix A: Emission Calculations
Scrap (Baler System)**

**Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump**

The Baler System which makes up the Scrap Processing System is a collection system that captures and routes trim scrap from the cutting operations and shredded board to the baler to be baled for recycling using a dedicated separator/cyclone unit. The cyclone is considered inherent process equipment. Baler system exhaust is then routed to a baghouse dust collector for particulate control before exhausting via stack inside the building.

Pollutant	Uncontrolled Emission Rate ¹ (Cyclone Outlet)		Baghouse Control Efficiency	Controlled Emission Rate ³ (Baghouse Outlet)	
	(lb/hr)	(tpy) ²		(lb/hr)	(tpy)
Filterable PM	0.54	2.37	99.5%	0.003	0.01
Total PM ₁₀	0.14	0.59	99.5%	0.001	0.003
Total PM _{2.5}	0.01	0.05	99%	0.0001	0.0005

Design Parameters for 2 Scrap Baler Systems and Associated Baghouse (Dust Collector)			
Parameter	Value	Units	Basis
Maximum Operating Hours	8,760	hr/yr	Assumes continuous annual operation for the Scrap Systems
Total Potential Maximum Feed Rate for the Scrap System	5.60	ton scrap/hr	Maximum Input Scrap Rate estimated using a generation rate per cutter from data at other GPI facilities.
Filterable PM Emission Factor	0.097	lb PM/ton scrap	Baler cyclone source test at GPI's Riverwood International facility (May 2000) plus a 25% safety margin.
Percent of Uncontrolled FPM ≤10 μm in diameter	25%	%	AP-42, Appendix B.2, Table B.2.2, Category 6 Process: Grain Handling Material: Grain Assumes all PM generated by the scrap waste system is filterable (negligible condensable PM generation).
Percent of Uncontrolled FPM ≤2.5 μm in diameter	2%	%	Conservatively used maximum values for the most similar process type. In addition, conservatively assumes that cumulative percentage is the maximum value plus the standard deviation.
Baghouse Control Efficiency, PM	99.5%	%	AP-42, Appendix B.2, Table B.2.3 for fabric filters.
Baghouse Control Efficiency, PM ₁₀	99.5%	%	
Baghouse Control Efficiency, PM _{2.5}	99%	%	

Notes:

¹ Uncontrolled filterable PM emission rates are based on a stack test-derived emission factor for a similar facility. The uncontrolled emission rates for PM₁₀ and PM_{2.5} were then calculated based on Appendix B.2, Table B.2.2, Category 6 particle size distribution.

² Annual emissions for all PM species are based on the maximum hourly PM emission rate.

³ Controlled emission rates of filterable PM, PM₁₀, and PM_{2.5} were calculated by applying the appropriate control efficiencies from AP-42, Appendix B.2, Table B.2.3 for fabric filters.

⁴ There are two Brause and two Bobst type cutters that feed the baler systems at the facility.

Equations:

1) Uncontrolled PM Emission Rate (lb/hr) = Maximum Feed Rate for Scrap (ton scrap/hr) x PM Emission Factor (lb PM/ton scrap)

2) Uncontrolled PM₁₀ Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 10 μm in diameter

3) Uncontrolled PM_{2.5} Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 2.5 μm in diameter

4) Controlled PM Emission Rate (lb/hr) = Uncontrolled PM Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM)

5) Controlled PM₁₀ Emission Rate (lb/hr) = Uncontrolled PM₁₀ Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM₁₀)

6) Controlled PM_{2.5} Emission Rate (lb/hr) = Uncontrolled PM_{2.5} Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM_{2.5})

**TSD Appendix A: Emission Calculations
Ink Mixing**

**Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump**

Source ID	Emission Unit	Max Batch Size ^a (lb)	Cycle Time ^a (hr)	Max Production Rate ^b (lb/hr)	Emission Factor ^c (lb/lb VOC)	Max VOC Content	VOC Input ^d (lb/hr)	VOC Emissions ^{d,e}	
								(lb/hr)	(ton/yr)
IM001	Ink Mixing	480	0.5	960	0.00087	3.5%	33.6	0.03	0.13

Notes:^a Taken from facility data.^b Production rate determined by dividing maximum batch size by the corresponding cycle time.^c Emission factors developed from source testing data published by the National Association of Printing Ink Manufacturers (NAPIM). See Table 3-3 of "National Association of Printing Ink Manufacturers Guide to Estimating VOC Emissions from Printing Ink Manufacturing", June 1996, Table 3-3. The factor presented in lb VOC / 100 lb product has been translated into lb VOC / lb VOC content by applying the VOC content of the inks tested to derive the factors.^d VOC input determined by applying ink VOC content to the maximum production rate. VOC emissions determined by applying the lb/lb VOC input emission factor to the VOC input.^e Annual emissions are calculated assuming maximum usage occurs over a the following work schedule (hr/yr):

8,760

Equations:

- 1) VOC Input (lb/hr) = Max Production Rate (lb/hr) x Max VOC Content (%)
- 2) Potential VOC Emissions (lb/hr) = VOC Input (lb/hr) x Emission Factor (lb/lb VOC)
- 3) Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs

**TSD Appendix A: Emission Calculations
Parts Washer**

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Source ID	Emission Unit	Maximum Usage Rate ^a (gal/yr)	Density ^b (lbs/gal)	VOC ^b (wt%)	VOC ^b (lb/gal)	Potential VOC Emissions ^{c,d}	
						(lbs/hr)	(ton/yr)
PW001	Parts Washer	20	6.55	100%	6.55	0.01	0.03

Notes:

^a Maximum usage of the parts washer is based on how often solvent is changed out in a year.

^b VOC content and specific gravity are taken from SDS information.

^c Annual VOC emissions are calculated assuming that half of the volatile content is emitted during cleaning operations.

^d Short-term emissions are calculated assuming maximum usage occurs over a typical work schedule:

8,760

Equations:

1) $\text{VOC (lbs/gallon)} = \text{Density (lbs/gal)} \times \text{VOC (wt\%)}$

2) $\text{Potential VOC Emissions (lbs/hr)} = \text{VOC (lbs/gallon)} \times \text{Max. Usage Rate (gallons/yr)} \times 50\% \text{ Loss Factor} / \text{Max Operating Hours (hr/yr)}$

3) $\text{Potential VOC Emissions (tons/yr)} = \text{Potential VOC Emissions (lbs/hr)} \times \text{Max Operating Hours (hr/yr)} \times 1 \text{ ton}/2000 \text{ lbs}$

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Graphic Packaging International-Auburn
Source Address: 1201 South Grandstaff Dr., Auburn, IN 46706
Permit Number: M033-42870-00131
Reviewer: Paul Jump

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	10000	1.894	1.9	691.3
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	10000	1.894	1.9	691.3
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Totals			2.0		2.0			3.8	1382.6

Average Vehicle Weight Per Trip = tons/trip
Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, Ef = $k * [(s/12)^a] * [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	1.0	1.0	1.0	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E * [(365 - P)/365]$
where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.84	0.49	0.05	lb/mile
Mitigated Emission Factor, Eext =	1.21	0.32	0.03	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.42	0.11	0.01
Vehicle (leaving plant) (one-way trip)	0.42	0.11	0.01
	0.00	0.00	0.00
	0.00	0.00	0.00
Totals	0.84	0.22	0.02

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per day (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per day (trip/day)]
Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: **Graphic Packaging International-Auburn**
Source Address: **1201 South Grandstaff Dr., Auburn, IN 46706**
Permit Number: **M033-42870-00131**
Reviewer: **Paul Jump**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	1.0	4.0	35.0	140.0	1000	0.189	0.8	276.5
Vehicle (leaving plant) (one-way trip)	4.0	1.0	4.0	35.0	140.0	1000	0.189	0.8	276.5
Totals			8.0		280.0			1.5	553.0

Average Vehicle Weight Per Trip = tons/trip
Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	35.0	35.0	35.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.268	0.654	0.1604	lb/mile
Mitigated Emission Factor, Eext =	2.988	0.598	0.1467	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.41	0.08	0.02
Vehicle (leaving plant) (one-way trip)	0.41	0.08	0.02
Totals	0.83	0.17	0.04

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 18, 2020

Furqan Shaikh
Graphic Packaging International Auburn
1500 Riveredge Pkwy
Atlanta GA 30328

Re: Public Notice
Graphic Packaging International Auburn
Permit Level: MSOP
Permit Number: 033-42870-00131

Dear Furqan Shaikh:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 42870

and

IDEM's Virtual File Cabinet (VFC): <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Eckhart Public Library, 603 S Jackson St, Auburn IN 46706. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Paul Jump, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6555 or dial (317) 234-6555.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 18, 2020

To: Eckhart Public Library 603 S Jackson St Auburn IN 46706

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Graphic Packaging International Auburn
Permit Number: 033-42870-00131

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 18, 2020
Graphic Packaging International Auburn
033-42870-00131

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

Mail Code 61-53

IDEM Staff	LPOGOST 9/18/2020 Graphic Packaging International Auburn 033-42870-00131 draft) 1 of 2			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Furqan Shaikh Graphic Packaging International Auburn 1500 Riveredge Pkwy Atlanta GA 30328 (Source CAATS)									
2		Ryan Creager Plant Manager Graphic Packaging International Auburn 1201 Grandstaff Dr Auburn IN 46706 (RO CAATS)									
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)									
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)									
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)									
7		Auburn City Council and Mayors Office P.O. Box 506 Auburn IN 46706-0506 (Local Official)									
8		DeKalb County Health Department 220 E 7th St, Ste 110 Auburn IN 46706 (Health Department)									
9		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)									
10		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)									
11		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)									
12		Eckhart Public Library 603 S Jackson St Auburn IN 46706 (Library)									
13		Mr. Mike Wieczorek Ramboll Environ 333 W Wacker Dr, Ste 2700 Chicago IL 60606 (Consultant)									
14		Nucor Building Products 305 Industrial Parkway Waterloo IN 46793 (Affected Party)									
15		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	LPOGOST 9/18/2020 Graphic Packaging International Auburn 033-42870-00131 draft) 2 of 2		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Lisa The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)										
2												
3												
4												
5												
6												
7												
8												
9												
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12												
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15												

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