

Mr. Randy E. Carter
Printpack, Inc.
P.O. Box 439
Greensburg, IN 47240-0439

Re: 031-10312
Significant Source Modification to:
OP NO.: T031-5950-00001

Dear Mr. Carter:

Printpack, Inc., was issued Part 70 operating permit T031-5950-00001 on December 21, 1998, for printed plastic bag and plastic film production process. An application to modify the source was received on October 29, 1998. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) flexographic printing press, identified as P17, including a drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute.
- (b) Two (2) flexographic printing presses, identified as P18 and P19, including drying systems rated at 0.8 million British thermal units per hour (MM Btu/hr) each, using a natural gas fired regenerative thermal oxidizer, OX20, with a rated capacity of 8.8 MM Btu/hr as control, and exhausting to stack SP20. The maximum printing width for each press is 62 inches and the maximum output is 1200 feet per minute.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Janusz Johnson or extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

JKJ

Attachments: proposed operation conditions (6 pages)

cc: File - Decatur County
U.S. EPA, Region V
Decatur County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

SECTION D.8 FACILITY OPERATION CONDITIONS

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

- (14) One (1) flexographic printing press, identified as P17, including a drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute.

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

D.8.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations) the printing press shall utilize a VOC reduction system that achieves at least 90% overall efficiency.

D.8.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

(a) The input of volatile organic compounds (VOC) to the printing press P17, including the usage of cleanup solvent, shall be limited to 683.4 tons per twelve (12) consecutive month period. During the first 12 months of operation, the VOC input shall be limited such that the total VOC input divided by the accumulated months of operation shall not exceed 56.95 tons per month of operation.

(b) The catalytic incinerator shall be operated at all times that the printing press is in operation and shall achieve a minimum overall control efficiency of 95%.

Compliance with items (a) and (b) limits the PTE of volatile organic compounds (VOC) emitted from the P17 printing press to 35.44 tons per twelve (12) consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, do not apply.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.8.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and control limitations contained in Condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.8.5 Control Requirement

The catalytic incinerator for VOC control, OX16, shall be in operation at all times that the press (P17) is in operation.

D.8.6 Testing Requirements [326 IAC 2-7-6(1)]

A compliance stack test shall be performed for the catalytic incinerator, OX16, used to achieve compliance with 326 IAC 8-5-5 and 326 IAC 2-2. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 95% overall efficiency for this incinerator such that the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

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

D.8.7 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

D.8.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.8.2;
- (1) The volume weighted VOC content of the inks used for each month;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.8.1 and D.8.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.9 FACILITY OPERATION CONDITIONS

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

- (15) Two (2) flexographic printing presses, identified as P18 and P19, including drying systems rated at 0.8 million British thermal units per hour (MM Btu/hr) each, using a natural gas fired regenerative thermal oxidizer, OX20, with a rated capacity of 8.8 MM Btu/hr as control, and exhausting to stack SP20. The maximum printing width for each press is 62 inches and the maximum output is 1200 feet per minute.

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

D.9.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations) the printing presses shall utilize a VOC reduction system that achieves at least 90% overall efficiency.

D.9.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) The input of volatile organic compounds (VOC) to the printing presses P18 and P19, including the usage of cleanup solvent, shall be limited to 1418.0 tons per twelve (12) consecutive month period. During the first 12 months of operation, the VOC input shall be limited such that the total VOC input divided by the accumulated months of operation shall not exceed 118.16 tons per month of operation.
- (b) The catalytic incinerator shall be operated at all times that the printing press is in operation and shall achieve a minimum overall control efficiency of 97%.

Compliance with items (a) and (b) limits the PTE of volatile organic compounds (VOC) emitted from the P18 and P19 printing presses to 42.54 tons per twelve (12) consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, do not apply.

D.9.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.9.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and control limitations contained in Condition D.9.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.9.5 Control Requirement

The regenerative thermal oxidizer for VOC control, OX20, shall be in operation at all times that either of the presses (P18 or P19) is in operation.

D.9.6 Testing Requirements [326 IAC 2-7-6(1)]

A compliance stack test shall be performed for the regenerative thermal oxidizer, OX20, used to achieve compliance with 326 IAC 8-5-5 and 326 IAC 2-2. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 97% overall efficiency for this incinerator such that the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

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

D.9.7 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

D.9.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.9.1 and D.9.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.9.2;
- (1) The volume weighted VOC content of the inks used for each month;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.9.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.9.1 and D.9.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, IN 47240
Mailing Address: P.O. Box 439, Greensburg, IN 47240
ENSR Permit No.: 031-10312-00001
Facility: Flexographic Press P17
Parameter: VOC input
Limit: 683.4 ton/12 consecutive month period

Overall Control Efficiency as determined by last compliant stack test: _____
YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, IN 47240
Mailing Address: P.O. Box 439, Greensburg, IN 47240
ENSR Permit No.: 031-10312-00001
Facility: Flexographic Presses P18 and P19
Parameter: VOC input
Limit: 1418 ton/12 consecutive month period

Overall Control Efficiency as determined by last compliant stack test: _____
YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Source Modification

Source Background and Description

Source Name: Printpack, Inc.
Source Location: 1505 West Main Street, Greensburg, IN 47240
County: Decatur
SIC Code: 2673 and 3081
Operation Permit No.: T031-5950-00001
Source Modification No.: 031-10372
Permit Reviewer: Janusz Johnson

The Office of Air Management (OAM) has reviewed an application from Printpack, Inc., relating to the construction of the following three (3) new eight-color flexographic presses:

- (a) One (1) flexographic printing press, identified as P17, including a drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute.
- (b) Two (2) flexographic printing presses, identified as P18 and P19, including drying systems rated at 0.8 million British thermal units per hour (MM Btu/hr) each, using a natural gas fired regenerative thermal oxidizer, OX20, with a rated capacity of 8.8 MM Btu/hr as control, and exhausting to stack SP20. The maximum printing width for each press is 62 inches and the maximum output is 1200 feet per minute.

Existing Approvals

The source was issued a Part 70 Operating Permit (T031-5950-00001) on December 21, 1998.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SP16	Catalytic Incinerator* for: Press 16* Press 17	48	4	19,307	370
SP20	Regenerative Thermal Oxidizer for: Press 18 Press 19	50	5	37,812	203

* Press 16 and the Catalytic Incinerator are already permitted under the Part 70 permit.

Recommendation

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

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

An application for the purposes of this review was received on October 29, 1998, with a letter received on January 6, 1999, requesting review under the revised 326 IAC 2 rules which were promulgated on December 25, 1998.

Emission Calculations

Volatile Organic Compound (VOC) emissions from printing operations

Given: worst case ink usage based on 250% coverage
worst ink is 1.22 lbs VOC/lb solids
maximum hours of operation accounting for inherent down time is 6570 hrs/yr
20 gallons per day of cleaning solvents used for each press (7 lbs VOC/gal)
Press P17 controlled by OX16 (catalytic oxidizer with 95% control efficiency)
Presses P18 & P19 controlled by OX20 (RTO with 97% control efficiency)

Potential ink VOC emissions from each press (P17, P18 & 19):

$1200 \text{ ft/min} * 60 \text{ min/hr} * 5.2 \text{ ft wide print area} * 1 \text{ ream/3000 sq ft} = 124 \text{ reams/hr}$
 $124 \text{ reams/hr} * 0.55 \text{ lb solids/ream} * 1.22 \text{ lbs VOC/lb solids} * 250\% = 208.0 \text{ lbs VOC/hr}$
 $208 \text{ lbs VOC/hr} * 6570 \text{ hrs runtime/yr} * 1 \text{ ton/2000 lbs} = 683.3 \text{ tons VOC/yr, each press}$

Potential cleaning solvent VOC emissions from each press (P17, P18 & 19):

$20 \text{ gal/day} * 365 \text{ days/yr} * 7 \text{ lbs/gal} * 1 \text{ ton/2000 lbs} = 25.5 \text{ tons VOC/yr, each press}$

Controlled VOC emissions from Press P17:

$(683.3 \text{ ton/yr} + 25.5 \text{ ton/yr}) * (1 - 95\%) = 35.4 \text{ tons/yr}$

Controlled VOC emissions from Presses P18 and P19 (combined):

$2 * (683.3 \text{ ton/yr} + 25.5 \text{ ton/yr}) * (1 - 97\%) = 42.5 \text{ tons/yr}$

Combustion Emissions

Natural gas combustion emissions from the 8.8 MMBtu/hr OX20 RTO and the three (3) 0.8 MMBtu/hr press dryers (total combined heat input is 11.2 MMBtu/hr):

$\text{Potential natural gas throughput} = 11.2 \text{ MMBtu/hr} * 8760 \text{ hrs/yr} * 1 \text{ MMCF/1000 MMBtu}$
 $= 98.1 \text{ MMCF/yr}$

Potential emissions (ton/yr) = throughput (MMCF/yr) * emission factor * 0.0005 ton/lb

Pollutant	AP-42 emission factor (lb/MMCF)	Throughput (MMCF/yr)	Potential emissions (ton/yr)
PM	7.6	98.1	0.4
PM10	7.6	98.1	0.4
SO ₂	0.6	98.1	negligible
NO _x	100.0	98.1	4.9
VOC	5.5	98.1	0.3
CO	84.0	98.1	4.1

Proposed Project PTE

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.4
PM-10	0.4
SO ₂	negligible
VOC	2,126.7
CO	4.1
NO _x	4.9

- (a) This existing source is subject to the provisions of the Part 70 permitting program pursuant to 326 IAC 2-7, and the potential to emit nitrogen oxides from the proposed project is equal to or greater than 25 tons per year. Therefore, the proposed project requires a Significant Source Modification pursuant to 326 IAC 2-7-10.5.
- (b) For the purpose of determining the level of approval required for the proposed project under the Part 70 rules, the Potential to Emit from the new equipment does not include controls because the application of controls in this case is not considered enforceable by the U.S. EPA until incorporated into the source’s Part 70 Operating Permit.

County Attainment Status

The source is located in Decatur County.

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

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

PSD Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
VOC	1745

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the AIRS Facility Quick Look Report, dated April 1, 1998.

PSD Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.4	0.4	neg.	78.2	4.1	4.9
Contemporaneous Increases	-	-	-	61.0	-	-
Contemporaneous Decreases	-	-	-	-214.3	-	-
Net Emissions	0.4	0.4	neg.	-75.1	4.1	4.9
PSD Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the net emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The contemporaneous increases and decreases considered are as follows:
 1. Added Press #16 in 1995, increase of 39 tons per year;
 2. Removed Press #11 on April 15, 1996, decrease of 89.67 tons per year;
 3. Removed Press #8 on July 26, 1996, decrease of 72.4 tons per year;

4. Removed Press #10 on July 26, 1996, decrease of 52.2 tons per year; and
5. Added manual parts washer in November, 1998, increase of 22 tons per year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the facilities of this proposed project. The NSPS Subpart QQ does not apply because it is a standard for rotogravure printing, not flexographic.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to the facilities of this proposed project.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a major PSD source. Presses 17, 18 and 19 have VOC controls which, in combination with netted emission reductions, will keep the potential to emit of the new emission units below PSD significant levels.

326 IAC 2-6 (Emission Reporting)

326 IAC 2-6 (Emission Reporting)

The facilities that are part of this proposed project are subject to 326 IAC 2-6 (Emission Reporting) because the source emits more than 100 tons per year of VOC. Pursuant to this rule, the owner/operator of these facility must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

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

The requirements of this rule apply to the three (3) new printing presses that comprise the proposed project. Press P17 will comply with parts (c) and (d) of this rule by exhausting through the existing catalytic incinerator, OX16, which is capable of achieving 95% destruction efficiency. Presses P18 and P19 shall comply with parts (c) and (d) of this rule by exhausting through the new regenerative thermal oxidizer, OX20, which is capable of achieving 97% destruction efficiency. Additionally, compliance with this rule may be determined pursuant to 326 IAC 8-1-4.

Part 70 Permit Conditions

The operation of the emission units in this proposed project will be subject to the requirements of 326 IAC 2-7. Pursuant to this rule, these facilities must have the following:

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

Compliance Requirements

Because the new emission units of the proposed project will be operated under the source's Part 70 Operating Permit issued under 326 IAC 2-7, it is necessary to ensure that source can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5.

The compliance monitoring requirements applicable to the emission units of the proposed project are as follows:

- (a) For Press P17, a continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer, OX16, for measuring operating temperature. The output of this system shall be recorded, and the temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.
- (b) For Presses P18 and P19, a continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer (RTO), OX20, for measuring operating temperature. The output of this system shall be recorded, and the temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.

These monitoring requirements are necessary because the use of the catalytic oxidizer and the regenerative thermal oxidizer as controls satisfies the requirements of 326 IAC 8-5-5 (Graphic Arts Operations), and reduces VOC emissions so that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y. None of the listed air toxics will be emitted from this proposed project.

Conclusion

The construction of this proposed project shall be subject to the Construction Conditions of the attached proposed **Significant Source Modification No. 031-10312-00001**. Operation of the equipment shall be subject to the Operation Conditions of the attached proposed Significant Source Modification at such time as it is incorporated into the source's Part 70 Operating Permit (T031-5950-00001) by an Administrative Amendment.