

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of a Part 70 Permit  
Significant Source Modification

for Independent Packaging  
in Monroe County

Part 70 No.: T105-10511-00018  
Significant Source Modification No.: 105-11179

Notice is hereby given that the above-mentioned company, located at 303 North Curry Pike, Bloomington, Indiana, 47404, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Significant Source Modification to a Part 70 source for the construction of a flexographic printing press.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed source modification should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals.

A copy of the application and proposed source modification is available for examination at the Monroe County Public Library, 303 East Kirkwood Avenue, Bloomington, Indiana, 47401-3592. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the air pollution impact of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAM, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Shantanu Pahi, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Spahi

Mr. Jack Culver  
Independent Packaging  
303 North Curry Pike  
Bloomington, IN 47404

Re: Significant Source Modification No:  
105-11179-00018 to a not yet issued  
Part 70 No.: T105-10511-00018

Dear Mr. Culver:

Independent Packaging applied for a Part 70 operating permit on December 29, 1998 for flexographic printing of polyethylene film process. An application to modify the source was received on July 23, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

- (a) One (1) eight color flexographic printing press, identified as press # 5, with a maximum line speed of 1200 feet per minute and a maximum printing width of fifty (50) inches, using #3 catalytic oxidizer as control, exhausting at one (1) stack, identified as #3.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

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 Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Spahi

cc: File - Monroe County  
U.S. EPA, Region V  
Monroe County Health Department  
Air Compliance Section Inspector - Joe Foyst  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Independent Packaging  
303 North Curry Pike  
Bloomington, Indiana 47404**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 105-11179-00018	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary flexographic printing of polyethylene film process.

Responsible Official: Jack Culver  
Source Address: 303 North Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 North Curry Pike, Bloomington, Indiana 47404  
Phone Number: 812-339-9294  
SIC Code: 2759  
County Location: Monroe  
County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Minor Source, under PSD or Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

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

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) eight color flexographic printing press, identified as press # 5, with a maximum line speed of 1200 feet per minute and a maximum printing width of fifty (50) inches, using #3 catalytic oxidizer as control, exhausting at one (1) stack, identified as #3.

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

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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.

### **B.2 Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

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

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

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), 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.

### **B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]**

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a

concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

#### B.6 Phase Construction Time Frame

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

- (a) Construction of the flexographic printing press # 5 has not begun within eighteen (18) months from the effective date of this approval or if during the construction of flexographic printing press # 5, work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

#### B.7 BACT Determination for Phase Constructions

That pursuant to 40 CFR 52.21(j)(4), for phase construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than eighteen (18) months prior to commencement of construction of each independent phase of the project.

**SECTION C GENERAL OPERATION CONDITIONS**

C.1 Certification ~~[326 IAC 2-7-4(f)]~~~~[326 IAC 2-7-6(1)]~~~~[326 IAC 2-7-5(3)(C)]~~

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

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

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM. IDEM and OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification ~~[326 IAC 2-7-11]~~ ~~[326 IAC 2-7-12]~~

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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

- (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.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

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

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

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

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

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

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

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

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

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

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

#### C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this approval;

- (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of

receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

##### C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM and OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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 and OAM on or before the date it is due.

- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (1) One (1) eight color flexographic printing press, identified as press # 5, with a maximum line speed of 1200 feet per minute and a maximum printing width of fifty (50) inches, using #3 catalytic oxidizer as control, exhausting at one (1) stack, identified as #3.

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Miscellaneous operations: graphic arts operations), on and after the date the performance test is completed, the owner or operator shall not cause or discharge more than 10 percent of the captured VOC's at any time (90 % VOC destruction efficiency of the oxidizer) from the flexographic printing press # 5 by using the oxidizer operated at the most recently demonstrated overall efficiency.
- (b) When operating the oxidizer to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used in conjunction with the oxidizer to attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the oxidizer, of 60% for the flexographic printing press # 5. The overall destruction efficiency and the use of the incinerator are required by the rule 326 IAC 8-5-5.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2, and 40 CFR 52.21]

- (a) Any change or modification which may increase the VOC input to 625 tons per year or more based on an overall control efficiency of 60% from the flexographic printing press # 5 must be approved by the Office of Air Management (OAM) before such change may occur.
- (b) The oxidizer for VOC control shall be in operation at all times when the printing press # 5 is in operation.

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

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

### Compliance Determination Requirements

#### D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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.1.5 Minimum Temperature Requirement For Catalytic Oxidizer

When operating, the catalytic oxidizer shall maintain a minimum temperature of 600 °F or the minimum operating temperature determined by the latest stack test that will achieve at least a 60% overall efficiency for the oxidizer.

**D.1.6 Testing Requirements [326 IAC 2-7-6(1)]**

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- (a) The Compliance stack tests for capture and destruction shall be performed for the press #5 and #3 catalytic oxidizer used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed by the end of the June 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 60% overall efficiency for this oxidizer.

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

**D.1.7 Parametric Monitoring**

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A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic 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.1.8 Record Keeping Requirements**

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To document compliance with Conditions D.1.1 and D.1.2, 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.1.2.

- (1) The 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 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.

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

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Independent Packaging  
Source Address: 303 North Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 North Curry Pike, Bloomington, Indiana 47404  
Source Modification No.: 105-11179-00018

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

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

## Indiana Department of Environmental Management Office of Air Management

Addendum to the  
Technical Support Document for a Significant Source Modification to a not yet issued  
Part 70 Operating Permit

<b>Source Name:</b>	<b>Independent Packaging</b>
<b>Source Location:</b>	<b>303 North Curry Pike, Bloomington, Indiana</b>
<b>County:</b>	<b>Monroe</b>
<b>SIC Code:</b>	<b>2759</b>
<b>Operation Permit No.:</b>	<b>T105-10511-00018</b>
<b>Operating Permit Issuance Date:</b>	<b>Not issued yet</b>
<b>Significant Source Modification No.:</b>	<b>105-11179-00018</b>
<b>Permit Reviewer:</b>	<b>Spahi</b>

On August 21, 1999, the Office of Air Management (OAM) had a notice published in the Herald Times, Bloomington, Indiana, stating that Independent Packaging had applied for a Part 70 Operating Permit to operate a eight color flexographic printing press. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The OAM has decided to make the following changes to the permit:

1. The descriptive information about the equipment in condition A.2 on page 3 and condition D.1 on page 13 shall include the #3 catalytic oxidizer as a control for the eight color flexographic printing press.
2. Condition D.1.6 on page 14 shall state that the compliance stacks tests for capture and destruction shall performed for the press #5 and #3 catalytic oxidizer used to achieve compliance with 326 IAC 8-5-5.
3. An affidavit of construction shall be included with the permit.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**#3 Catalytic Oxidizer**

**Company Name: Independent Packaging**

**Address City IN Zip: 303 North Curry Pike, Bloomington, Indiana 47404**

**CP: 105-11179**

**Pit ID: 105-00018**

**Reviewer: Spahi**

**Date: 07-29-99**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.9

8.1

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.4	0.0	0.3

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

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

**Company Name:**  
**Address City IN Zip:**  
**CP:**  
**Plt ID:**  
**Reviewer:**  
**Date:**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.517E-06	4.867E-06	3.042E-04	7.301E-03	1.379E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.028E-06	4.461E-06	5.678E-06	1.541E-06	8.517E-06

Methodology is the same as page 1.

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

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name:** Independent Packaging  
**Address City IN Zip:** 303 North Curry Pike, Bloomington, Indiana 47404  
**CP:** 105-11179  
**Pit ID:** 105-00018  
**Reviewer:** SPahi  
**Date:** 07-28-99

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
5	1200	50	378432

INK VOCS					
Ink Name Press Id	Maxium Coverage '(lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Cut Ink includes solvent 5	5.6	73%	100.00%	378432	773.52
		0%	0.00%	378432	0.00
Solvent # 301 5	5.1	100%	100.00%	378432	<b>965.00</b>
		0%	0.00%	378432	0.00
Solvent # 302 5	5.1	100%	100.00%	378432	<b>965.00</b>
		0%	0.00%	378432	0.00
Ink 5	6.1	70%	100.00%	378432	807.95
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00
		0%	0.00%	378432	0.00

Worst solvent	<b>965.00 Ton/yr</b>
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\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY**

Throughput = Maxium line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )