

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY
and IDEM NORTHWEST INDIANA OFFICE**

**ProEdge, Inc.
23326 Shelby Road
Shelby, Indiana 46377**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F089-12875-00447	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

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Stratospheric Ozone Protection

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One (1) packaging rotogravure printing press (Cerutti # 001)

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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), and IDEM Northwest Indiana Office. The information describing the source contained in conditions A.1 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary Packaging Rotogravure printing press.

Authorized individual:	Adelbert Bell
Source Address:	23326 Shelby Road, Shelby, Indiana 46377
Mailing Address:	16007 Delmar Court, Lowell, Indiana 46356
SIC Code:	2754
Source Location Status:	Lake
County Status:	Nonattainment for PM10, SO ₂ and ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001 with a maximum line speed of 620 feet per minute (ft/min), and one (1) natural gas fired press dryer oven system with combined heat input rate of 12.2 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a total capture enclosure vented to thermal/catalytic oxidizer, with a heat input capacity of 9.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Six (6) natural gas-fired space heaters with a combined heat input rate of 1.24 MMBtu per hour;
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) Application of oils, greases, lubricants or other non volatile materials applied as temporary protective coatings.

- (e) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (f) Closed loop heating and cooling systems.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on site sewage treatment facility.
- (i) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower.
- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
- (m) A laboratory as defined in 326 IAC 2-7-1(20)(C).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and IDEM Northwest Indiana Office shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

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

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and IDEM Northwest Indiana Office within a reasonable time, any information that IDEM, OAQ, and IDEM Northwest Indiana Office 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. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and IDEM Northwest Indiana Office copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and IDEM Northwest Indiana Office may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and IDEM Northwest Indiana Office on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and IDEM Northwest Indiana Office may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and IDEM Northwest Indiana Office upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and IDEM Northwest Indiana Office. IDEM, OAQ, and IDEM Northwest Indiana Office may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 or IDEM Northwest Indiana Office makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or IDEM Northwest Indiana Office within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and IDEM Northwest Indiana Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 219 881 6725
Facsimile No.: 219 881 6745

Failure to notify IDEM, OAQ, and IDEM Northwest Indiana Office by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and IDEM Northwest Indiana Office may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and IDEM Northwest Indiana Office by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or IDEM Northwest Indiana Office determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, or IDEM Northwest Indiana Office to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or IDEM Northwest Indiana Office at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or IDEM Northwest Indiana Office may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and IDEM Northwest Indiana Office, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and IDEM Northwest Indiana Office on or before the date it is due.

- (2) If IDEM, OAQ and IDEM Northwest Indiana Office upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAQ, and IDEM Northwest Indiana Office takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and IDEM Northwest Indiana Office any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and IDEM Northwest Indiana Office in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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, IDEM Northwest Indiana Office U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

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

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on October 18, 2000.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 14-10-4 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and IDEM Northwest Indiana Office not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and IDEM Northwest Indiana Office, if the source 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.10 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. 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

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

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

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

within 180 days from the date on which this source commences operation).

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, and IDEM Northwest Indiana Office, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ and IDEM Northwest Indiana Office, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ and IDEM Northwest Indiana Office upon request and shall be subject to review and approval by IDEM, OAQ and IDEM Northwest Indiana Office. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed

pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (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, OAQ that retesting in one-hundred and twenty (120) 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.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and IDEM Northwest Indiana Office on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or IDEM Northwest Indiana Office makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or IDEM Northwest Indiana Office within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- IDEM Northwest Indiana Office
Gainer Bank Building
Suite 418
504 North Broadway
Gary, IN 46402
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and IDEM Northwest Indiana Office on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001 with a maximum line speed of 620 feet per minute (ft/min), and one (1) natural gas fired press dryer oven system with combined heat input rate of 12.2 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a total capture enclosure vented to thermal/catalytic oxidizer, with a heat input capacity of 9.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an oxidation system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

- (1) Each oxidation control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.
- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.1.6 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. Pursuant to 40 CFR 63.820(a)(2), the permittee has chosen to limit emissions of any single HAP and any combination of HAPs from the entire source including printing press Cerutti #001 to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Pursuant to 40 CFR 63.820(a)(3), each source for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source; and is subject only to the provisions of 40 CFR 63.829(d), which requires the permittee to maintain records of all required measurements and calculations needed to demonstrate compliance with the HAP usage, on a monthly basis. The permittee shall remain an area source by complying with the following upon start up of this new coating facility;

- (1) the total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press Cerutti #001 shall be limited to less than 200 and 500 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%.

D.1.7 Emission Offset [326 IAC 2-3]

The source-wide potential to emit VOC is limited to less than 25 tons per year, therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press (Cerutti #001) shall be limited to 320 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the printing press (Cerutti #001) shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%. This will limit the potential to emit VOC from the printing press (Cerutti #001) to 16.0 tons per twelve (12) consecutive month period and the source wide potential to emit (PTE) VOC to less than 25 TPY.

D.1.8 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 the control devices.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each oxidation control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.1.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with the VOC and HAP content and usage limitations contained in conditions D.1.6 and D.1.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.11 VOC Emissions

Compliance with the VOC and HAP usages contained in conditions D.1.6 and D.1.7 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.1.12 Volatile Organic Compounds (VOC) and HAP Control

-
- (a) The catalytic or thermal oxidizers controlling VOC and HAP emissions from the printing press shall be in operation at all times that these units are in operation to ensure compliance with conditions D.1.6 and D.1.7.
 - (b) When the catalytic oxidizer is used, it shall maintain a minimum catalytic bed temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain a minimum 95% overall control (including capture and destruction) of the VOC.
 - (c) When the thermal oxidizer is used, it shall maintain a minimum combustion zone temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain a minimum 95% overall control (including capture and destruction) of the VOC.

D.1.13 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the oxidizer shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and
- (b) When a catalytic oxidizer is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each oxidizer shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

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

D.1.14 Record Keeping Requirements [326 IAC 8-1-12] [326 IAC 2-3] [326 IAC 8-5-5]

- (a) To document compliance with VOC and HAP usage limitations in conditions D.1.6 and D.1.7, the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
 - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC and HAP usage for each month at each press while operating the oxidizers;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (6) The required overall emission reduction efficiency for each day for each coating facility.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Record Keeping Requirements [326 IAC 8-1-12] [326 IAC 2-3] [326 IAC 8-5-5]

- (a) To document compliance with control efficiency limitations in conditions D.1.4 and D.1.7, the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
 - (1) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.1.9 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (2) Control device monitoring data as follows:

- (A) For the thermal oxidizer, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the oxidizer; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
- (B) For each catalytic oxidizer, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the oxidizer;
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (3) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (4) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.22 and 326 IAC 8-1-9(c).

D.1.16 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;

- (3) Time, date and duration of the noncompliance; and
- (4) Corrective action taken.

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with VOC and HAP usage limitations in conditions D.1.6 and D.1.7 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and IDEM NORTHWEST INDIANA OFFICE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ProEdge, Inc.
Source Address: 23326 Shelby Road, Shelby, Indiana 46377
Mailing Address: 16007 Delmar Court, Lowell, Indiana 46356
FESOP No.: F089-12875-00447

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (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 QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and IDEM NORTHWEST INDIANA OFFICE

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ProEdge, Inc.
Source Address: 23326 Shelby Road, Shelby, Indiana 46377
Mailing Address: 16007 Delmar Court, Lowell, Indiana 46356
FESOP No.: F089-12875-00447

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and IDEM NORTHWEST INDIANA OFFICE**

FESOP Quarterly Report

Source Name: ProEdge, Inc
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: 16007 Delmar Court, Lowell, Indiana 46356
 FESOP No.: F089-12875-00447
 Facility: Printing Press (Cerutti #001)
 Parameter: VOC usage
 Limit: The VOC usage for the printing press shall be limited to less than 320 tons per 12 consecutive month period. VOC emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall VOC control efficiency of 95%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and IDEM NORTHWEST INDIANA OFFICE**

FESOP Quarterly Report

Source Name: ProEdge, Inc.
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: 16007 Delmar Court, Lowell, Indiana 46356
 FESOP No.: F089-12875-00447
 Facility: Source wide including printing press (Cerutti # 001)
 Parameter: worst case single HAP usage and total HAP usage
 Limit: The total combined usage of the worst case single HAP and total HAPs delivered to the applicators, including clean up solvents, shall be limited to less than 200 and 500 tons per 12 consecutive month period, respectively.

YEAR: _____

Month	Column 1a	Column 1b	Column 2a	Column 2b	Column 1a + 2a	Column 1b + 2b
	Single HAP Usage This Month	Total HAP Usage This Month	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total	Total HAP Usage 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: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and IDEM NORTHWEST INDIANA OFFICE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ProEdge, Inc.
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: 16007 Delmar Court, Lowell, Indiana 46356
 FESOP No.: F089-12875-00447

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

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and IDEM Northwest Indiana Office**

**Technical Support Document (TSD) for a New Source Construction and
Federally Enforceable Operating Permit (FESOP)**

Source Background and Description

Source Name: ProEdge, Inc.
Source Location: 23326 Shelby Road, Shelby, Indiana 46377
County: Lake
SIC Code: 2754
Operation Permit No.: F089-12875-00447
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from ProEdge, Inc. relating to the construction and operation of one Packaging Rotogravure printing press.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001 with a maximum line speed of 620 feet per minute (ft/min), and one (1) natural gas fired press dryer oven system with combined heat input rate of 12.2 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a total capture enclosure vented to thermal/catalytic oxidizer, with a heat input capacity of 9.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Six (6) natural gas-fired space heaters with a combined heat input rate of 1.24 MMBtu per hour;
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) Application of oils, greases, lubricants or other non volatile materials applied as temporary protective coatings.
- (e) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

- (f) Closed loop heating and cooling systems.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on site sewage treatment facility.
- (i) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower.
- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
- (m) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
001	Press: Cerutti # 001	30	TBD	TBD	TBD

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on October 18, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 through 5).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

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

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

HAP's	Potential To Emit (tons/year)
Toluene	greater than 10
MEK	greater than 10
MIBK	greater than 10
Hexane	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year and the source is located in Lake County. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Press: Cerutti # 001	0.00	0.00	0.00	16.0	0.00	0.00	< 9.62	< 24.5
Natural Gas Combustion (Dryer Ovens, Oxidizer & Space heaters)	0.7	0.7	0.06	0.50	8.30	9.80	0.18	0.19
Total Emissions	0.7	0.7	0.06	16.5	8.30	9.80	< 10	< 25.0

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate non-attainment
SO ₂	primary non-attainment
NO ₂	attainment
Ozone	severe non-attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This facility is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.430 through 60.435, Subpart QQ) because it is a packaging rotogravure printing press, not a publication rotogravure printing press to which Subpart QQ applies.
- (c) This packaging rotogravure printing source, inclusive of printing press Cerutti #001, is subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants), Subpart KK, 40 CFR 63, and 326 IAC 20-18 because the potential emissions of any combination of HAPs and a single HAP are each greater than 25 and 10 tons per year, respectively. However, the permittee has chosen to limit source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Pursuant to 40 CFR 63.820(a)(3), each source for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 63.830(b)(1). Therefore, the following applies to printing press Cerutti #001:

- (1) Pursuant to 40 CFR 63.820(a)(2)(i) and (ii), the total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press Cerutti #001 shall be limited to less than 200 and 500 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the printing press Cerutti #001 shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%.
- (2) Pursuant to 40 CFR 63.829(d), the owner or operator of each source which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offset), this source is not considered a major source as defined by this rule because the source will limit its VOC emissions to less than twenty-five (25) tons per year. Therefore, the Emission Offset rules, 326 IAC 2-3, will not apply.

- (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press (Cerutti #001) when applying solvent based materials, shall be limited to 320 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the printing press (Cerutti #001) shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%. This will limit the potential to emit VOC from the printing press (Cerutti #001) to 16.0 tons per twelve (12) consecutive month period and the source wide potential to emit (PTE) to less than 25 TPY.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Lake County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 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 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, VOC emissions from the packaging rotogravure printing press Cerutti #001 will be controlled by a catalytic or thermal oxidizer which will limit the source-wide VOC emissions to less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible 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:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.

326 IAC 6-1-11.1 (Fugitive Particulate Matter Emission Limitations in Lake County)

This source is subject to the requirements of 326 IAC 6-1-11.1 (Fugitive Particulate Matter Emission Limitations in Lake County). The rule requires that, for facilities and operations at the source, the average instantaneous opacity of fugitive particulate emissions from each facility or operation shall not exceed ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

State Rule Applicability - Individual Facilities

326 IAC 2-4-1.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4-1.1 (New Source Toxics Control), any new process or production unit which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source will limit the potential emissions from the entire source including printing press (Cerutti #001) of any single HAP and any combination of HAPs to less than 10 and 25 tons per year, respectively. Therefore, 326 IAC 2-4-1.1 does not apply to the printing presses.

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

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), facilities not regulated by other rules in Article 8, with potential VOC emissions equal to or greater than 25 tons per year, shall comply utilize Best Available Control Technology. The one (1) packaging rotogravure printing press (Cerutti #001) is subject to 326 IAC 8-5-5 (Graphic Arts Operations), therefore, it is not subject to this rule.

326 IAC 8-1-12 (VOC Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices)

- (a) Pursuant to 326 IAC 8-1-12(a), this rule applies to any source that uses a control device to comply with a VOC emission limit, and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3) for Graphics Arts Operations. This source meets the applicability criteria of 326 IAC 8-5-5(a)(2) and 326 IAC 8-5-5(a)(3). The source also proposes to use control devices to meet the requirements of 326 IAC 8-5-5 when applying solvent based materials, therefore, the requirements of 326 IAC 8-1-12 apply to this source when operating the VOC control device.
- (b) Pursuant to 326 IAC 8-1-12(b), upon startup of a new coating facility, the owner or operator of the coating facility shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
 - (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
 - (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the

- previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (a) startup of a new coating facility
 - (b) changing the method of compliance
 - (c) receipt of a written request from the department or U.S.EPA.
 - (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test.
 - (2) Monitoring equipment requirements shall be as follows:
 - (A) If a thermal oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the oxidizer shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (B) If a catalytic oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the oxidizer shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (C) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.
- (c) Pursuant to 326 IAC 8-1-12(c), on and after startup of a new coating facility, the owner or operator of a coating facility identified in subsection (a) shall collect and record each day and maintain all of the following information each day for each coating facility:
 - (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit of volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit of volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit of volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C) of this rule.
 - (6) Control device monitoring data as follows:
 - (A) For thermal oxidizers, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the oxidizer.
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

- (B) For catalytic oxidizers, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the oxidizer.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including the dates and duration of any outages.
- (d) Pursuant to 326 IAC 8-1-12(d), upon startup of a new coating facility, the owner or operator of a coating facility shall notify the department in either of the following instances:
 - (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (C) Time, date, and duration of the noncompliance.
 - (D) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of control device to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of section 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance for a coating facility from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively.

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

The packaging rotogravure printing Press (Cerutti #001) is subject to 326 IAC 8-5-5 because it is a new construction, located in Lake county, and have potential VOC emissions greater than 25 tons per year. Pursuant to this rule, no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five (25) percent by volume or less of VOC, and seventy-five (75) percent by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains sixty (60) percent by volume or more of nonvolatile material; or
- (c) the owner or operator installs and operates:
 - 1) a carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight;

- 2) an oxidizer system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustion carbon) to carbon dioxide and water; or
- 3) an alternative volatile organic compound emission reduction system demonstrated to have at least a ninety percent (90%) reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.
- (e) A capture system must be used in conjunction with the emission control systems. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

The source shall comply with the rule by utilizing a VOC capture and control system with an overall VOC control efficiency of 95% at printing press (Cerutti #001).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The one (1) packaging rotogravure printing presses have applicable compliance monitoring conditions as specified below:
 - (a) Pursuant to 326 IAC 8-1-12(b), upon startup of a new coating facility, the owner or operator of the coating facility shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
 - (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.

- (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted.
Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (a) startup of a new coating facility
 - (b) changing the method of compliance
 - (c) receipt of a written request from the department or U.S.EPA.
 - (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test.
- (2) Monitoring equipment requirements shall be as follows:
- (A) If a thermal oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the oxidizer shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (B) If a catalytic oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of in the gas stream immediately before and after the catalyst bed of the oxidizer shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (C) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.
- (b) Pursuant to 326 IAC 8-1-12(c), on and after May 1, 1997, the owner or operator of a coating facility identified in subsection (a) shall collect and record each day and maintain all of the following information each day for each coating facility:
- (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit of volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit of volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit of volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.

- (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C) of this rule.
 - (6) Control device monitoring data as follows:
 - (A) For thermal oxidizers, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the oxidizer.
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For catalytic oxidizers, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the oxidizer.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including the dates and duration of any outages.
- (c) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press (Cerutti #001) shall be limited to 320 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the press (Cerutti #001) shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%. This will limit the potential to emit VOC from Pres (Cerutti #001) when applying solvent based materials, to 16.0 tons per twelve (12) consecutive month period and the source wide potential to emit (PTE) VOC to less than 25 TPY.
- (d) The total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press (Cerutti #001) shall be limited to less than 200 and 500 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 95%. This will limit the potential to emit any single HAP and total HAPs from the entire source to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

- (d) Pursuant to 40 CFR 63.829(d), the permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

The monitoring conditions are necessary because the oxidizer must operate properly to ensure compliance with 326 IAC 8-5-5, 326 IAC 2-3, 326 IAC 2-8 and 326 IAC 8-1-12.

Conclusion

The operation of this packaging rotogravure printing plant shall be subject to the conditions of the attached proposed **FESOP No.: F089-12875-00447**.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100**

Company Name: ProEdge, Incorporated
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46356
CP: CP-12875-00447
Pit ID: 089-00447
Reviewer: Adeel Yousuf/EVP
Date: November 28, 2000

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
22.4	196.6

Heat Input Capacity includes:

One (1) 12.2 MMBtu/hr press dryer system (ID No. 01); one (1) 9.0 MMBtu/hr supplementary natural gas fired oxidizer;
 Seven (7) natural gas fired space heaters with combined heat input of 1.24 MMBtu/hr.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.7	0.7	0.06	9.8	0.5	8.3

*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 0.3 - < 100**

HAPs Emissions

Company Name: ProEdge, Incorporated
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
CP: CP-12875-00447
Pit ID: 089-00447
Reviewer: Adeel Yousuf/EVP
Date: November 28, 2000

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	2.064E-04	1.179E-04	7.372E-03	1.769E-01	3.342E-04

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	4.914E-05	1.081E-04	1.376E-04	3.735E-05	2.064E-04

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: Emission Calculations
VOC From Printing Press Operations**

Company Name: ProEdge, Incorporated
Address City IN Zip: 16007 Delmar Court, Lowell, Indiana 46356
Construction Permit: CP-12875-00447
Plt ID: 089-00447
Reviewer: Adeel Yousuf/EVP
Date: January 18, 2001

Potential Uncontrolled Emissions:

Throughput for Packaging Rotogravure Printing Press:

Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 Min/ Hour	8,760 HR YEAR	1/1,000,000	Potential MMin ² /Year
Cerutti ID# 001	620	12	31.0	60	8,760	1,000,000	121,224

PRINTING VOC:

Ink Name	Maxium Coverage lbs/ MMin ²	Weight % Organics	Flash Off %	Potential Throughput MMin ² /Year	Tons/ 2,000 lbs	VOC Pounds per Hour	VOC Tons per Year
Press ID: Cerutti 001							
Base Intermediate	11.4	75.00%	100%	121,224	2,000	118.32	518.23
Light Maple	42.7	56.00%	100%	121,224	2,000	330.90	1449.36
White	45.5	55.00%	100%	121,224	2,000	346.31	1516.82
Dark Oak	34.1	57.00%	100%	121,224	2,000	268.98	1178.12
Total Potential Uncontrolled Emissions:						1064.51	4,662.53

Controlled and Limited Emissions:

Press I.D.	Control Device	Capture System Capture Efficiency	Thermal/Catalytic Oxidizer Destruction Efficiency	Controlled/Limited VOC Pounds per Hour	Controlled/Limited VOC Tons per Year
Cerutti 001	catalytic/thermal oxidizer	100.00%	95.00%	53.23	233.13
Total Controlled Emissions:				53.23	233.13
Total Limited Emissions:	VOC Input Limit as % of potential input:	6.86%		3.65	15.99

Note: Heat set offset printing has an assumed flash off of 80%; other type of printers have a flash off of 100%
ProEdge will limit press VOC usage to 320 TPY.

Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year
VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency)) * VOC Input Limitation (%)

Appendix A: Emission Calculations

Company Name: ProEdge, Incorporated
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46356
CP: CP-12875-00447
Plt ID: 089-00447
Reviewer: Adeel Yousuf/EVP
Date: January 18, 2001

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Printing Operation	Natural Gas Combustion	TOTAL
PM	0.00	0.70	0.7
PM10	0.00	0.70	0.7
SO2	0.00	0.06	0.1
NOx	0.00	9.80	9.8
VOC	4,662.00	0.50	4,662.5
CO	0.00	8.30	8.3
total HAPs	2,523.00	0.19	2,523.2
worst case single HAP	(Toluene) 1923.00	(Hexane) 0.18	(Toluene) 1923.00
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled and Limited Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Printing Operation	Natural Gas Combustion	TOTAL
PM	0.00	0.70	0.7
PM10	0.00	0.70	0.7
SO2	0.00	0.06	0.1
NOx	0.00	9.80	9.8
VOC*	16.00	0.50	16.5
CO	0.00	8.30	8.3
total HAPs**	24.70	0.19	24.9
worst case single HAP***	(Toluene) 9.62	(Hexane) 0.18	(Toluene) 9.62
Note:			
*ProEdge will limit printing press operation VOC usage to 6.86% of potential usage (320 tons VOC/yr).			
VOC emissions will be controlled by a control system with a minimum overall control efficiency of 95%			
The combination of VOC usage limitation and control will limit VOC emissions from printing press to less than 16.0 TPY,			
16.0 tons VOC/yr from the press + 0.5 tons VOC/yr from natural gas combustion equal to total of 16.5 tons VOC/yr.			
**Total HAPs are limited to less than 25 tons/yr (total usage of 500 tons HAPs/yr).			
***Worst case single HAP emissions are limited to less than 10 tons/yr (total usage of 200 tons HAP/yr).			
Total emissions based on rated capacity at 8,760 hours/year, after control.			