



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 1, 2005
RE: Printpack, Inc / 105-16875-00018
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Printpack, Inc.
 303 N. Curry Pike
 Bloomington, Indiana 47404**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T 105-10511-00018	Date Issued: April 25, 2000
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	

First Significant Permit Modification No.: T 105-15751-00018, issued November 20, 2002

Second Significant Permit Modification No.: T105-16875-00018	Affected Pages: 3, 4, 28, 29, 30, 30a, 31, 32, 32a, with 30b and 32b deleted
Original signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 1, 2005

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

- C.8 Compliance Schedule [326 IAC 2-7-6(3)]
- C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.11 Monitoring Methods [326 IAC 3]
- C.12 Temperature Gauge Specifications

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Presses #1 - #4 & Mixing Room (EU-001, 002 & 004)

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.1.4 Volatile Organic Compounds (VOC)
- D.1.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

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

- D.1.6 Monitoring Requirements

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

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS: Press #5 (EU-003)

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 2-1.1-11] [40 CFR 52.21]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.2.4 Volatile Organic Compounds (VOC)

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

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

D.2.6 Monitoring Requirements

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

D.2.7 Record Keeping Requirements

D.2.8 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS: Insignificant Activities

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

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

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

D.3.2 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

Certification

Emergency/Deviation Occurrence Report

Quarterly Report 1

Quarterly Report 2

Quarterly Compliance Monitoring Report

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

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

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

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

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the following shall apply:

- (a) The processes EU-001 (presses #1 - #3) and EU-002 (press #4) shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;
- (b) The oxidation system shall maintain a minimum destruction efficiency of 90%.

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) The Permittee shall limit the VOC emissions from processes EU-001, EU-002 and EU-004 to less than 250 tons per twelve (12) consecutive month period.
- (b) The Permittee shall maintain a minimum destruction efficiency of 90% and a capture efficiency as determined by the most recent stack test.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-001 and EU-002 (Presses #1 - #4) and their control devices and the EU-004 (mixing room).

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

D.1.4 Volatile Organic Compounds (VOC)

(a) To achieve compliance with the limit in Condition D.1.2 and the requirements of Condition D.1.1, the Permittee shall operate and maintain at all times the catalytic oxidizers and an associated capture system when processes EU-001 and EU-002 are in operation.

(b) To determine compliance with Conditions D.1.1 and D.1.2, the owner or operator shall have the following:

(1) In order to determine compliance with Condition D.1.2, the following equation shall apply:

$$[X * (1 - (CE \text{ EU-001} * DE \text{ EU-001}))] + [Y * (1 - (CE \text{ EU-002} * DE \text{ EU-002}))] + [0.02 * Z] \leq 250 \text{ tons per year}$$

Where:

X = VOC input to EU-001 (tons VOC/year),
Y = VOC input to EU-002 (tons VOC/year), and
Z = VOC input to EU-004 (tons VOC/year)

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test.

DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test.

CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test.

DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test.

(2) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 550 F.

(A) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.2, as approved by IDEM.

(B) On and after the date the approved stack results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

(3) Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s).

(4) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.

(5) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:

- (A) Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;
- (B) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
- (C) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
- (D) Monthly visual inspections of rooftop ductwork;
- (E) Annual flow direction (i.e., "smoke") tests; and
- (F) Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.1.3.

- (6) The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer. The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; and;
- (7). Determine the 12 consecutive month period total VOC emissions utilizing the following equation:

$$\text{Tons VOC/12 consecutive month period} = [(\text{tons VOC past 11 months}) + (\text{tons VOC this month})]$$

D.1.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

- (a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2 1/2) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform a destruction efficiency compliance stack tests to determine compliance with Condition D.1.1 and Condition D.1.2; and
 - (b) On or before October 25, 2002, the Permittee shall perform one capture test on processes EU-001 (presses #1-#3) and EU-002 (press #4).
-

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

D.1.6 Monitoring Requirements

There are no monitoring requirements for this section.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Tons of VOC usage from inks, coatings, and press cleaning each month. (this information may be retained in the computerized information management system of the plant);
 - (2) The calculated weight of VOCs emitted for each month, from processes EU-001, EU-002, and EU-004;
 - (3) The VOC emissions in tons per year shall be calculated by D.1.4 (b);
 - (4) The calculated 12 consecutive month period sum of VOC emissions for each month;
 - (5) A copy of the most recent oxidizer destruction efficiency test report;

- (6) A copy of the representative baseline capture efficiency test report;
- (b) To determine compliance with D.1.4 (b) (2), the Permittee shall maintain records of the catalytic oxidizer operating temperature (three (3) hour average);
- (c) To determine compliance with D.1.4 (b) (3), the Permittee shall maintain records of the duct pressure of the capture system; and
- (d) To determine compliance with D.1.4 (b) (5), the Permittee shall maintain results of the inspections.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the following shall apply:

- (a) The process EU-003 (press #5) shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;
- (b) The oxidation system shall maintain a minimum destruction efficiency of 90%.

D.2.2 PSD Minor Limit [326 IAC 2-2]

- (a) The Permittee shall limit the VOC emissions from process EU-003 (press #5) to less than 250 tons per twelve (12) consecutive month period.
- (b) The Permittee shall maintain a minimum destruction efficiency of 90% and a capture efficiency as determined by the most recent stack test.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-003 (Press #5) and its control device.

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

D.2.4 Volatile Organic Compounds (VOC)

- (a) To achieve compliance with the limit in Condition D.2.2 and the requirements of Condition D.2.1, the Permittee shall operate and maintain at all times the catalytic oxidizers and an associated capture system when process EU-003 is in operation.
- (b) To determine compliance with Conditions D.2.1 and D.2.2, the owner or operator shall have the following:
 - (1) In order to determine compliance with Condition D.2.2, the following equation shall apply:

$$[X * (1 - (CE \text{ EU-003} * DE \text{ EU-003}))] \leq 250 \text{ tons per year}$$

Where:

X = VOC input to EU-003 (tons VOC/year),
CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test
DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test.

- (2) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 600 F.
 - (A) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.2, as approved by IDEM.
 - (B) On and after the date the approved stack results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.
- (3) Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s).
- (4) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.
- (5) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (A) Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;
 - (B) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (C) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (D) Monthly visual inspections of rooftop ductwork;
 - (E) Annual flow direction (i.e., "smoke") tests; and
 - (F) Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.2.3.

- (6) The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer. The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; and
- (7) Determine the 12 consecutive month period total VOC emissions utilizing the following equation:

$$\text{Tons VOC/12 consecutive month period} = [(\text{tons VOC past 11 months}) + (\text{tons VOC this month})]$$

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

- (a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2 1/2) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform a destruction efficiency compliance stack tests to determine compliance with Condition D.2.1 and Condition D.2.2; and
- (b) On or before October 25, 2002, the Permittee shall perform one capture test on process EU-003 (press #5).

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

D.2.6 Monitoring Requirements

There are no monitoring requirements for this section.

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

D.2.7 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Tons of VOC usage from inks, coatings, and press cleaning each month. (this information may be retained in the computerized information management system of the plant);
 - (2) The calculated weight of VOCs emitted for each month, from process EU-003;
 - (3) The VOC emissions in tons per year shall be calculated by D.2.4 (b) (1);
 - (4) The calculated 12 consecutive month period sum of VOC emissions for each month;
 - (5) A copy of the most recent oxidizer destruction efficiency test report;
 - (6) A copy of the representative baseline capture efficiency test report; and
- (b) To determine compliance with D.2.4 (b) (2), the Permittee shall maintain records of the catalytic oxidizer operating temperature (three (3) hour average);
- (c) To determine compliance with D.2.4 (b) (3), the Permittee shall maintain records of the duct pressure of the capture system; and
- (d) To determine compliance with D.2.4 (b) (5), the Permittee shall maintain results of the inspections.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

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

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	303 North Curry Pike, Bloomington, Indiana 47404
County:	Monroe
SIC Code:	2759
Operation Permit No.:	T105-10511-00018
Operation Permit Issuance Date:	April 25, 2000
Modification Permit No.:	SPM105-15751-00018
Operation Permit Issuance Date:	November 20, 2002
Modification Permit No.:	SPM105-16875-00018
Permit Reviewer:	James Farrell/MD

The Office of Air Quality (OAQ) has reviewed a petition for review for Printpack, Inc. relating to a stationary flexographic printing facility.

History

Printpack, Inc. (Printpack) was issued a Part 70 operating permit (T105-10511-00018) on April 25, 2000. Printpack was issued a Part 70 significant permit modification (105-15751-00018) on November 20, 2002. Printpack petitioned for review of the Part 70 significant permit modification on December 4, 2002. This petition was filed in the Office of Environmental Adjudication under Cause Number 02-A-J-2979. On June 17, 2004, the source, OLC and OAQ entered into a temporary stay of certain permit conditions to allow for additional time to resolve the permit conditions. This permit modification shows the changes made to the Part 70 operating permit in order to settle issues raised by the petition for review. Changes made to the significant permit modification will be incorporated into the Part 70 operating permit. A Second Significant Permit Modification has been drafted to resolve the issues raised by the source.

The appeal requests follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing as **bold type** in the responses. In addition to the changes made to address appealed provisions, the Table of Contents and page numbering have been changed as needed.

Appeal Item 1:

The Petitioner objects to Conditions D.1.1, D.1.2, D.1.5, D.2.1, D.2.2 and D.2.5 (Volatile Organic Compounds, PSD Minor Limit and Testing Requirements). The Petitioner believes the conditions impose repetitive and extremely expensive capture testing programs not mandated by Indiana Air Pollution Control Rules. The Petitioner believes that the capture testing program is unnecessarily duplicative of other monitoring requirements in the permit.

The Petitioner also states that the permit contains a reliable Compliance Assurance Monitoring (CAM) plan to ensure that capture efficiencies remain at the level set by the documented efficiencies and by the Indiana Air Pollution Control Rule for Graphics Arts Operations (326 IAC 8-5-5).

The Petitioner believes the requirement that capture testing be performed every five years is unnecessary, unreasonable, unduly burdensome and in excess of the authority granted to IDEM under Indiana law. The Petitioner believes the CAM plan is reasonable and more than sufficient to assure compliance with applicable legal requirements.

Response 1:

IDEM, OAQ is unable to make the changes as requested to the Volatile Organic Compounds, PSD Minor Limit and Testing Requirements in Conditions D.1.1, D.1.2, D.1.5, D.2.1, D.2.2 and D.2.5. IDEM, OAQ has determined that 326 IAC 8-5-5 (Miscellaneous operations: Graphic Arts Operations) applies to the source and the source must demonstrate compliance with all requirements of this rule. In order to comply with the 326 IAC 8-5-5(c) (3) (B), which requires oxidization of at least 90% of the volatile organic compounds and compliance with 326 IAC 8-5-5(e) (3) which requires an overall control efficiency of sixty percent (60%) for flexographic printing processes, periodic testing is needed to demonstrate that the destruction and overall efficiencies are being achieved.

The continuous monitoring and emission control equipment requirements in conditions D.1.6 and D.2.6 and the testing requirements listed in conditions D.1.5 and D.2.5 are for compliance determination purposes. All requirements listed in conditions D.1.6 and D.2.6 aid in compliance monitoring to determine the control device and capture system is operating normally and achieving the required destruction and overall efficiencies. This ensures that Prevention of Significant Deterioration is not applicable. Conditions D.1.1, D.1.2, D.1.5, D.2.1, D.2.2 and D.2.5 are being modified as follows in order to resolve these issues of this petition for review:

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

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

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), **the following shall apply:**

- (a) ~~The Permittee shall install, operate, and maintain catalytic oxidizers and an associated capture system to capture and control emissions from processes EU-001 (presses #1-#3) and EU-002 (press #4)~~ **shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;**
- (b) **The oxidation system shall maintain a minimum destruction efficiency of 90%. Said emission control equipment shall achieve, at a minimum, destruction and overall control efficiencies of 90% and 60%, respectively.**

~~Until the initial compliance stack tests are performed, the Permittee shall maintain the catalytic oxidizers at a minimum operating temperature of 550 degrees Fahrenheit and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.~~

~~After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizers and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.~~

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.24]

- (a) The Permittee shall limit the VOC emissions from processes EU-001, EU-002 and EU-004 to less than 250 tons per **twelve (12) consecutive month period.** ~~year, based on a twelve (12) month rolling total.~~
- (b) **The Permittee shall maintain a minimum destruction efficiency of 90% and capture efficiency as determined by the most recent stack test.**

~~(b) To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.1.1, the Permittee shall operate and maintain at all times processes EU-001 and EU-002 are in operation, catalytic oxidizers and an associated capture system:~~

~~(1) according to the requirements specified in Condition D.1.1; and~~

~~(2) at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.1.2.~~

D.1.5 Testing Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-1.1-11]

(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2 1/2) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform a **destruction efficiency** compliance stack tests to **determine compliance with** establish the operating temperature(s) of the catalytic oxidizer(s) that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2; and

(b) On or before October 25, 2002, the Permittee shall perform one capture test on process EU-001 (presses #1-#3) and EU-002 (press #4).

~~(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the duct pressure range(s) of the capture system(s) that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2.~~

~~The stack tests required in Part (a) of this Condition shall be performed at least once every two and one half (2 1/2) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.~~

~~The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.~~

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), **the following shall apply:**

(a) The Permittee shall install, operate, and maintain catalytic oxidizers and an associated capture system to capture and control emissions from process EU-003 (press #5) **shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;**

(b) The oxidation system shall maintain a minimum destruction efficiency of 90%.

~~Until the initial compliance stack tests are performed, the Permittee shall maintain the catalytic oxidizer at a minimum operating temperature of 600 degrees Fahrenheit and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.~~

~~After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizer and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.~~

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The Permittee shall limit the VOC emissions from process EU-003 (**press #5**) to less than 250 tons per year **twelve (12) consecutive month period**, based on a twelve (12) month rolling total.

(b) The Permittee shall maintain a minimum destruction efficiency of 90% and capture efficiency as determined by the most recent stack test.

~~(b) To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.2.1, the Permittee shall operate and maintain at all times process EU-003 is in operation, a catalytic oxidizer and an associated capture system:~~

~~(1) according to the requirements specified in Condition D.2.1; and~~

~~(2) at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.2.2.~~

D.2.5 Testing Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-1.1-11]

~~(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2 1/2) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform a **destruction efficiency** compliance stack tests to **determine compliance with** establish the operating temperature of the catalytic oxidizer that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2; and~~

(b) On or before October 25, 2002, the Permittee shall perform one capture test on process EU-003 (press #5).

~~(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the duct pressure range of the capture system that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2.~~

~~The stack tests required in Part (a) of this Condition shall be performed at least once every two and one half (2 1/2) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.~~

~~The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.~~

Appeal Item 2:

The Petitioner objects to Conditions D.1.6 and D.2.6 (Continuous Monitoring Systems and Emission Control Equipment). The Petitioner states the conditions inaccurately describe "duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system".

The Petitioner believes the conditions reference to an oxidizer press controller which is unclear and is not part of the standard control description for oxidizers.

Response 2:

IDEM OAQ has reviewed the requested changes to the Continuous Monitoring Systems and Emission Control Equipment language in Conditions D.1.6 and D.2.6. It is IDEM, OAQ's intention to provide the most accurate description of the control device and measuring and recording equipment for IDEM field inspectors to determine compliance. Conditions D.1.6 and D.2.6 shall be revised and incorporated into Conditions D.1.4 and D.2.4, respectively, all changes are as follows:

D.1.6 ~~Continuous Monitoring Systems and Emission Control Equipment~~

~~To determine compliance with the limits of Conditions D.1.1 and D.1.2, the owner or operator shall:~~

- ~~(a) Install, calibrate, maintain, and operate according to the manufacturer=s specifications:~~
- ~~(1) A continuous monitoring system (CMS) on the catalytic oxidizers for measuring the operating temperature, and~~
 - ~~(2) Duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;~~

~~And~~

- ~~(b) develop and implement the following additional inspection, maintenance, and preventive measures other than those required under Condition D.1.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:~~
- ~~(1) Monthly inspection, routine maintenance, and if necessary, repair and/or replacement of flexible press hoses and fan motor belts;~~
 - ~~(2) quarterly inspection, routine maintenance, and if necessary, repair and/or replacement of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);~~
 - ~~(3) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;~~
 - ~~(4) monthly visual inspections, routine maintenance, and if necessary, repair and replacement of rooftop ductwork;~~
 - ~~(5) annual flow direction (i.e. "Smoke") tests;~~
 - ~~(6) annual calibration of the oxidizer press controller; and~~
 - ~~(7) inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer=s specifications.~~

~~These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.1.3.~~

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

D.1.4 Volatile Organic Compounds (VOC)

(a) To achieve compliance with the limit in Condition D.1.2 and the requirements of Condition D.1.1, the Permittee shall operate and maintain at all times the catalytic oxidizers and an associated capture system when processes EU-001 and EU-002 are in operation.

(b) To determine compliance with the VOC limit of Conditions D.1.1 and D.1.2, the Permittee owner or operator shall have the following: on a monthly basis:

~~(a) determine the VOC emissions from processes EU-001, EU-002, and EU-004, utilizing the following equation:~~

(1) In order to determine compliance with Condition D.1.2, the following equation shall apply:

$$[X * (1 - (CE EU-001 * DE EU-001))] + [Y * (1 - (CE EU-002 * DE EU-002))] + [0.02 * Z] \leq 250 \text{ tons per year VOC/month}$$

Where:

- X = VOC input to EU-001 (tons VOC/month~~year~~),
- Y = VOC input to EU-002 (tons VOC/month~~year~~), and
- Z = VOC input to EU-004 (**tons VOC/year**)

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test.

DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test.

CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test.
DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test.

- (2) **A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 550 F.**
- (A) **The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.2, as approved by IDEM.**
- (B) **On or after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.**
- (3) **Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s)**
- (4) **The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.**
- (5) **Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
- (A) **Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;**
- (B) **Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);**
- (C) **Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
- (D) **Monthly visual inspections of rooftop ductwork;**
- (E) **Annual flow direction (i.e., "smoke") tests; and**
- (F) **Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.**

These inspections, maintenance, and prevention measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.1.3.

- (6) The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer. The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; and
- (7b) ~~d~~**Determine the 12 month rolling consecutive month period total VOC emissions utilizing the following equation:**

$$\text{Tons VOC/yr (12 month rolling total)} = \frac{\text{12 consecutive month period}}{12} = \frac{[(\text{tons VOC past 11 months}) + (\text{tons VOC this month})]}{12}$$

D.2.6 Continuous Monitoring Systems and Emission Control Equipment

~~To determine compliance with the limits of Conditions D.2.1 and D.2.2, the owner or operator shall:~~

- ~~(a) install, calibrate, maintain, and operate according to the manufacturer=s specifications:~~
- ~~(1) a continuous monitoring system (CMS) on the catalytic oxidizer for measuring the operating temperature, and~~
 - ~~(2) duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;~~

~~and~~

~~(b) develop and implement the following additional inspection, maintenance, and preventive measures other than those required under Condition D.2.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:~~

- ~~(1) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of flexible press hoses and fan motor belts;~~
- ~~(2) quarterly inspection, routine maintenance, and if necessary, repair and/or replacement of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);~~
- ~~(3) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;~~
- ~~(4) monthly visual inspections, routine maintenance, and if necessary, repair and replacement of rooftop ductwork;~~
- ~~(5) annual flow direction (i.e. "Smoke") tests;~~
- ~~(6) annual calibration of the oxidizer press controller; and~~
- ~~(7) inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer=s specifications.~~

~~These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.2.3.~~

D.2.4 Volatile Organic Compounds (VOC)

(a) To achieve compliance with the limit in Condition D.2.2 and the requirements of Condition D.2.1, the Permittee shall operate and maintain at all times the catalytic oxidizers and an associated capture system when process EU-003 is in operation.

(b) To determine compliance with the VOC limit of Conditions D.2.1 and D.2.2, the Permittee owner or operator shall have the following: , on a monthly basis:

~~(a) determine the VOC emissions from process EU-003, utilizing the following equation:~~

(1) In order to determine compliance with D.2.2, the following equation applies:

$$[X * (1 - (CE \text{ EU-003} * DE \text{ EU-0043}))] = <250 \text{ tons per year VOC/month}$$

Wwhere:

X = VOC input to EU-003 (tons VOC/yearmonth),
CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test
DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test.

(2) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 600 F.

- (A) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.2 , as approved by IDEM.
- (B) On or after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.
- (3) Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s)
- (4) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.
- (5) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (A) Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;
 - (B) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (C) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (D) Monthly visual inspections of rooftop ductwork;
 - (E) Annual flow direction (i.e., "smoke") tests; and
 - (F) Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.

These inspections, maintenance, and prevention measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.2.3.

- (6) The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer. The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; and;
- (7b) ~~d~~Determine the 12 ~~month rolling~~ **consecutive month period** total VOC emissions utilizing the following equation:

$$\text{Tons VOC/yr (12 month rolling total)} \quad \mathbf{12 \text{ consecutive month period}} = [(\text{tons VOC past 11 months}) + (\text{tons VOC this month})]$$

Additional modifications

During the review of this appeal resolution the source submitted additional comments related to draft language and made additional suggestions related to Conditions D.1.8 and D.2.8. Due to modification of D.1.6 and D.2.6 into the respective D.1.4 and D.2.4, and the modifications to Conditions D.1.8 and D.2.8 the following changes have been made in the drafting of a resolution to the appeal of Printpack's Part 70 significant permit modification (105-15751-00018). The additional modifications are as follows:

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

D.1.76 Monitoring Requirements

There are no monitoring requirements for this section.

~~(1) To demonstrate compliance with the control requirements of Conditions D.1.1 and D.1.2, the Permittee shall record:~~

- ~~(1) the catalytic oxidizer operating temperatures required in Condition D.1.6(a)(1);~~
- ~~(2) the duct pressure of the capture system required in Condition D.1.6(a)(2); and~~
- ~~(3) the results of the inspections required in Condition D.1.6(b) including in the record the findings of the inspection and all maintenance actions taken.~~

~~(b) To demonstrate compliance with the VOC emission limit of Condition D.1.2, the owner or operator shall record on a monthly basis, the following from processes EU-001, EU-002, and EU-004:~~

- ~~(1) the input VOCs;~~
- ~~(2) the individual VOC emissions in tons per month;~~
- ~~(3) the combined total process VOC emissions in tons per month; and~~
- ~~(4) the 12 month rolling total VOC emissions;~~

~~as required in Condition D.1.4.~~

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

D.1.87 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (a1) through (g6) below.

~~(a) the VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);~~

(b1) Tons of the VOC usage from inks, coatings, and press cleaning each month. in tons per month (this information may be retained in the computerized information management system of the plant);

(e2) The calculated weight of VOCs emitted for each month, from processes EU-001, EU-002, and EU-004;

(d3) The VOC emissions in tons per year shall be calculated by D.1.4 (b) (1);

(d4) The estimated calculated 12-month rolling consecutive month period sum of total VOC emissions for after each month;

(d5) A copy of the most recent oxidizer destruction efficiency test report;

(e6) A copy of the representative baseline capture efficiency test report; and

(b) To determine compliance with D.1.4 (b) (2), the Permittee shall maintain records of the catalytic oxidizer operating temperature (three (3) hour average);

(c) To determine compliance with D.1.4 (b) (3), the Permittee shall maintain records of the duct pressure of the capture system; and

(d) To determine compliance with D.1.4 (b) (5), the Permittee shall maintain results of the inspections.

~~(f) records of the parametric monitoring conducted pursuant to the requirements of Condition D.1.7(a)(3).~~

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.98 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.1.1 and D.1.2~~ **(a)** 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.

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

D.2.76 Monitoring Requirements

There are no monitoring requirements for this section.

~~(a) To demonstrate compliance with the control requirements of Conditions D.2.1 and D.2.2, the Permittee shall record:~~

- ~~(1) the catalytic oxidizer operating temperatures required in Condition D.2.6(a)(1);~~
- ~~(2) the duct pressure of the capture system required in Condition D.2.6(a)(2); and~~
- ~~(3) the results of the inspections required in Condition D.2.6(b) including in the record the findings of the inspection and all maintenance actions taken.~~

~~(b) To demonstrate compliance with the VOC emission limit of Condition D.2.2, the owner or operator shall record on a monthly basis, the following from process EU-003:~~

- ~~(1) the input VOCs;~~
- ~~(2) the individual VOC emissions in tons per month;~~
- ~~(3) the combined total process VOC emissions in tons per month; and~~
- ~~(4) the 12 month rolling total VOC emissions;~~

~~as required in Condition D.2.4.~~

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

D.2.87 Record Keeping Requirements

(a) To document compliance with Conditions ~~D.2.1 and D.2.2~~, the Permittee shall maintain records in accordance with **(a1)** through **(g6)** below:

~~(a) the VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);~~

(b1) Tons of the VOC usage from inks, coatings, and press cleaning each month. in tons per month (this information may be retained in the computerized information management system of the plant);

~~(e2) The estimated monthly VOC emissions~~ **The calculated weight of VOCs emitted for each month**, from process EU-003;

(3) The VOC emissions in tons per year shall be calculated by D.2.4 (b) (1);

~~(d4) The estimated~~ **calculated 12-month rolling consecutive month period sum of total VOC emissions for after** each month;

~~(e5)~~ **A copy of the most recent oxidizer destruction efficiency test report;**

~~(f6)~~ **A copy of the representative baseline capture efficiency test report; and**

(b) To determine compliance with D.2.4 (b) (2), the Permittee shall maintain records of the catalytic oxidizer operating temperature (three (3) hour average);

(c) To determine compliance with D.2.4 (b) (3), the Permittee shall maintain records of the duct pressure of the capture system; and

(d) To determine compliance with D.2.4 (b) (5), the Permittee shall maintain results of the inspections.

~~(g) records of the parametric monitoring conducted pursuant to the requirements of Condition D.2.7(a)(3).~~

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.98 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.2.1 and D.2.2 (a)~~ 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.

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Permit Decisions

The modification to this permit and the inclusion of this modification into the Part 70 Operating Permit does not bind the IDEM in any future permitting decisions.

Existing Approvals

The source was issued a Part 70 Operating Permit T105-10511-00018 on April 25, 2000. The source has since received the following:

- (1) Significant Source Modification No.: 105-11179 issued on November 11, 1999.
- (2) Administrative Amendment No.: 105-14579 issued on August 21, 2001.
- (3) Reopening No.: 105-13426 issued on February 7, 2002.
- (4) Significant Permit Modification No.: 105-15751 issued on November 20, 2002

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this Significant Permit Modification as the resolution to the issues of the appeal be approved.

Conclusion

This Significant Permit Modification shall be subject to the conditions of the attached permit 105-16875-00018.