



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

August 14, 2003

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Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
RE: Exopack, LLC / 071-17149-00028  
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, ISTA Building, 150 W. Market Street, Suite 618, 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 8/11/03

**August 14, 2003**

Mr. Steve Teeters  
Exopack, LLC  
2200 D Avenue East  
Seymour, IN 47274-3259

Re: **071-17149-00028**  
First Significant Revision to  
**FESOP 071-16197-00028**

Dear Mr. Teeters:

Exopack, LLC was issued a permit on March 17, 2003 for a stationary multiwall bag printing operation. A letter requesting changes to this permit was received on January 24, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

Exopack, LLC has submitted an application to:

- (a) add one (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7; and
- (b) add one (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.

Proposed presses PS7 and PS8 do have several UV curing units associated with the presses. However, since there are no emissions associated with the proposed UV curing units and the UV curing units do not allow an increase in any regulated pollutant emissions or capacity from any of the existing source emission units, it is determined that the UV curing units are ancillary units. Thus, the UV curing units are not included in the press descriptions.

The presses and their associated dryers will not generate an increase in capacity or emissions from any existing source emission units. Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed presses and dryers.

The VOC UPTE due to the proposed modification (1474.45 tons/yr) is greater than the applicable level of 25 tons per year and the worst case single and combined HAP UPTE due to the modification (26.28 and 26.28 tons/yr, respectively) are greater than their respective applicable levels of 10 and 25 tons/yr.

Therefore, the proposed modification shall be permitted via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E) and (G) which states that modifications with VOC emissions greater than or equal to 25 tons/yr, worst case single HAP emissions greater than or equal to 10 tons/yr, and combined HAP emissions greater than or equal to 25 tons/yr, shall be permitted via a Significant Permit Revision.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions

The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

3. Effective Date of the Permit

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

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - Jackson County  
U.S. EPA, Region V  
Jackson County Health Department  
Air Compliance Section Inspector - Vaughn Ison  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP) RENEWAL  
OFFICE OF AIR QUALITY**

**Exopack, LLC  
2200 D Avenue East, Freeman Field  
Seymour, Indiana 47274-3259**

(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.: F071-16197-00028	Date Issued: March 17, 2003
First Significant Permit Revision No.: 071-17149-00028	Affected Pages: 2, 3, 4, 5, 6, 22, 23, 24, 30, and 31, with 3a, 24a, and 31a added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	<b>Issued: August 14, 2003</b>

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Quarterly Report Form

Quarterly Report Form

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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)]

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The Permittee owns and operates a stationary multiwall bag printing operation.

Authorized Individual: Plant Manager  
Source Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
Mailing Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
General Source Phone: (812) 522-6868  
SIC Code: 2674  
Source Location Status: Jackson  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source under PSD Rules  
Minor Source Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

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

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

- (a) One (1) Flexoline 8 color flexographic printing press, identified as PS1, constructed in 1986, with a maximum line speed of 1,200 feet per minute for ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack, identified as S2, and two (2) vents, identified as V3 and V4.
- (b) One (1) Flexoline 4 color flexographic printing press, identified as PS2, constructed in 1988, with a maximum line speed of 1,100 feet per minute, exhausting to two (2) vents, identified as V5 and V6.
- (c) One (1) Union Camp 2 color flexographic printing press, identified as PS3, constructed in 1996, with a maximum line speed of 500 feet per minute.
- (d) One (1) Advance Machine Technology one color flexographic printing press, identified as PS4, constructed in 1989, with a maximum line speed of 500 feet per minute.
- (e) One (1) two-color flexographic tail-end printing press, constructed in 2002, identified as PS5, with a maximum capacity of 155 pounds per hour of ink and varnish and with a maximum throughput of 44,700 square inches of paper per hour, exhausting to vent V5.
- (f) One (1) portable, two-color flexographic tail-end printing press, constructed in 2002, identified as PS6, with a maximum capacities of 155 pounds per hour of ink and varnish and will a maximum throughput of 44,700 square inches of paper per hour, exhausting to V6.

- (g) One (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7.
- (h) One (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.

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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. [326 IAC 8-9-6]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
  - (1) One (1) William & Davis Triples Manufacturing Company natural gas-fired boiler, constructed in 2000, with a maximum capacity of eighty-four hundredths (0.840) million British thermal units per hour, exhausting to stack S1. [326 IAC 6-2-4]
  - (2) Four (4) natural gas-fired press dryers, each with a maximum capacity of one (1) million British thermal units per hour.
  - (3) One (1) natural gas-fired press dryer, with a maximum capacity of one and six-tenths (1.6) million British thermal units per hour.
  - (4) Two (2) natural gas-fired space heaters, each with a maximum capacity of twenty-five hundredths (0.25) million British thermal units per hour.
  - (5) Two (2) natural gas-fired space heaters, each with a maximum capacity of three-tenths (0.3) million British thermal units per hour.
  - (6) Four (4) natural gas-fired space heaters, each with a maximum capacity of thirty-five hundredths (0.35) million British thermal units per hour.
  - (7) Five (5) natural gas-fired space heaters, each with a maximum capacity of four-tenths (0.4) million British thermal units per hour.
- (d) Vessels storing lubricating oils, hydraulic oils, and machining fluids.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (g) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.

- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) On-site fire and emergency response training approved by the department.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10): Printing Presses

- (a) One (1) Flexoline 8 color flexographic printing press, identified as PS1, constructed in 1986, with a maximum line speed of 1,200 feet per minute for ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack, identified as S2, and two (2) vents, identified as V3 and V4.
- (b) One (1) Flexoline 4 color flexographic printing press, identified as PS2, constructed in 1988, with a maximum line speed of 1,100 feet per minute, exhausting to two (2) vents, identified as V5 and V6.
- (c) One (1) Union Camp 2 color flexographic printing press, identified as PS3, constructed in 1996, with a maximum line speed of 500 feet per minute.
- (d) One (1) Advance Machine Technology one color flexographic printing press, identified as PS4, constructed in 1989, with a maximum line speed of 500 feet per minute.
- (e) One (1) two-color flexographic tail-end printing press, constructed in 2002, identified as PS5, with a maximum capacity of 155 pounds per hour of ink and varnish and with a maximum throughput of 44,700 square inches of paper per hour, exhausting to vent V5.
- (f) One (1) portable, two-color flexographic tail-end printing press, constructed in 2002, identified as PS6, with a maximum capacities of 155 pounds per hour of ink and varnish and will a maximum throughput of 44,700 square inches of paper per hour, exhausting to V6.
- (g) One (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7.
- (h) One (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.

(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 2-8-4(1)]

#### D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to flexographic presses PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8, except when otherwise specified in 40 CFR 63, Subpart KK.

#### D.1.2 Printing and Publishing Industry [326 IAC 20] [40 CFR 63, Subpart KK]

Flexographic presses PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 are subject to the requirements of 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). There are no emission limitations applicable to these units. Record keeping requirements applicable to these units are included in Condition D.1.12 of this section.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-8]

The VOC input to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 combined, shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is structured such that, when including the emissions from the insignificant activities, the source total VOC emissions remain less than one hundred (100) tons per year. Compliance with this limitation renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) The input of a single HAP to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit restricts the single HAP emissions from the source to less than ten (10) tons per year.

(b) The input of any combination of HAPs to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit restricts the emissions of any combination of HAPs from the source to less than twenty-five (25) tons per year.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), for flexographic presses PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8:

(a) The ink as it is applied to the substrate, less water, shall contain, sixty percent (60%) by volume or more nonvolatile material; or

(b) The volatile fraction of the ink, as it is applied to the substrate, less water, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

**Compliance Determination Requirements**

D.1.7 Volatile Organic Compound (VOC) Input Limit

To determine compliance with the VOC limit of Condition D.1.3, the owner or operator shall on a monthly basis:

(a) draft a list of all inks, varnishes, additives, and solvents used that contain VOCs;

(b) determine the following for each ink, varnish, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data obtained from the respective material safety data sheets (MSDS) and the applicable purchase orders, invoices, and source inventories for the most recent month:

- (1) the material density,
  - (2) the VOC fraction,
  - (3) the amount of material used, and
  - (4) the input VOC;
- (c) determine the sum total ink, varnish, additive, and solvent input VOC for the month;
  - (d) determine the sum total input VOC from the previous 11 months; and
  - (e) determine the 12 month rolling total input VOC.

#### D.1.8 Hazardous Air Pollutant (HAP) Input Limits

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To determine compliance with the HAP limits of Conditions D.1.2 and D.1.4, the owner or operator shall on a monthly basis:

- (a) draft a list of all inks, varnishes, additives, and solvents used that contain HAPs, and for each HAP containing ink, varnish, additive, and solvent, a list of the HAPs contained in the material;
- (b) determine the following for each HAP of each ink, varnish, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data obtained from the respective material safety data sheets (MSDS) and the applicable purchase orders, invoices, and source inventories for the most recent month:
  - (1) the material density,
  - (2) the HAP fraction,
  - (3) the amount of material used, and
  - (4) the input HAP for each HAP;
- (c) determine the sum total individual input HAP for the month;
- (d) determine the sum total combined input HAP for the month;
- (e) determine the sum total individual input HAP from the previous 11 months;
- (f) determine the sum total combined input HAP from the previous 11 months;
- (g) determine the 12 month rolling total individual input HAP,
- (h) determine the worst case 12 month rolling total individual input HAP from the input HAPs listed in Part (g) of this Condition, and
- (i) determine the 12 month rolling total combined input HAP.

#### D.1.9 Volatile Organic Compound Content (VOC)

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To determine compliance with the VOC content limitations contained in Condition D.1.5, the owner or operator shall:

- (a) comply with the applicable requirements of 326 IAC 8-1-2 and 326 IAC 8-1-4, or
- (b) prepare or obtain from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets.

However, the IDEM, OAQ, reserves at all times, the authority to require the owner or operator to determine compliance pursuant to the requirements specified in Part (a) of this Condition if deemed necessary.

## **Compliance Monitoring**

### **D.1.10 VOC and HAP Input Limits**

To demonstrate compliance with the VOC and HAP input limits of Conditions D.1.2, D.1.3 and D.1.4, the owner or operator shall record the information required in Conditions D.1.7 and D.1.8.

### **D.1.11 VOC Content**

To demonstrate compliance with the VOC content limits of Condition D.1.5, the owner or operator shall comply with one (1) of the following.

- (a) If compliance is being demonstrated using the methods specified in Part (a) of Condition D.1.9, the owner or operator shall, on a monthly basis, record the applicable 326 IAC 8-1-2 and 326 IAC 8-1-4 methods used to achieve compliance, including in the record as applicable, all test methods used, a description of the test protocol and procedures followed, the test parameters used, the data collected, a summary of the results, and a description demonstrating that compliance with the requirements has been achieved.
- (b) If compliance is being demonstrated using the method specified in Part (b) of Condition D.1.9, the owner or operator shall maintain and update on a monthly basis, the required “as applied” and “as supplied” VOC data sheets.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.12 Record Keeping Requirements**

- (a) To document compliance with the requirements of Conditions D.1.2, D.1.3, and D.1.4, the owner or operator shall keep records of the information recorded in Conditions D.1.10 and copies of all supporting documentation including all applicable purchase orders, invoices, source inventories, MSDS, and all other documentation used to determine the input VOCs and HAPs required in Conditions D.1.7 and D.1.8.
- (b) To document compliance with the requirements of Condition D.1.5, the owner or operator shall, as applicable, keep records of the information required in Condition D.1.11.

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

### **D.1.13 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

**FESOP Quarterly Report**

Source Name: Exopack, LLC  
Source Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
Mailing Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
FESOP No.: F071-16197-00028  
Facility: PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8  
Parameter: VOC input  
Limit: The VOC input to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 combined, shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Exopack, LLC  
Source Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
Mailing Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
FESOP No.: F071-16197-00028  
Facility: PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8  
Parameter: Single HAP input  
Limit: The input of a single HAP to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

		(Column 1)	(Column 2)	(Column 1 + Column 2)
	Worst Case HAP Name	Emissions This Month (tons)	Emissions Previous 11 Months (tons)	Worst Case Single HAP Emissions (tons)
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**

**FESOP Quarterly Report**

Source Name: Exopack, LLC  
Source Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
Mailing Address: 2200 D Avenue East, Freeman Field, Seymour, Indiana 47274-3259  
FESOP No.: F071-16197-00028  
Facility: PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8  
Parameter: Combined HAP input  
Limit: The combined input HAP to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

	(Column1) Emissions This Month (tons)	(Column 2) Emissions Previous 11 Months (tons)	(Column 1 + Column 2) Cpmbined HAP Emissions (tons)
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

### Technical Support Document (TSD) for a Significant Permit Revision to an Existing Source FESOP

#### Source Background and Description

Source Name:	Exopack, LLC - Seymour, Indiana
Source Location:	2200 D Avenue East, Seymour, Indiana 47274-3259
County:	Jackson
SIC Code:	2674
FESOP No.:	071-16197-00028
Issuance Date:	March 17, 2003
Significant Permit Revision No.:	071-17149-00028
Permit Reviewer:	SDF

#### Request

On January 24, 2003, Exopack, LLC submitted an application to:

- (a) add one (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7; and
- (b) add one (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.

Proposed presses PS7 and PS8 do have several UV curing units associated with the presses. However, since there are no emissions associated with the proposed UV curing units and the UV curing units do not allow an increase in any regulated pollutant emissions or capacity from any of the existing source emission units, it is determined that the UV curing units are ancillary units. Thus, the UV curing units are not included in the press descriptions.

The presses and their associated dryers will not generate an increase in capacity or emissions from any existing source emission units. Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed presses and dryers.

The VOC UPTE due to the proposed modification (1474.45 tons/yr) is greater than the applicable level of 25 tons per year and the worst case single and combined HAP UPTE due to the modification (26.28 and 26.28 tons/yr, respectively) are greater than their respective applicable levels of 10 and 25 tons/yr.

Therefore, the proposed modification shall be permitted via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E) and (G) which states that modifications with VOC emissions greater than or equal to 25 tons/yr, worst case single HAP emissions greater than or equal to 10 tons/yr, and combined HAP emissions greater than or equal to 25 tons/yr, shall be permitted via a Significant Permit Revision.

## Existing Approvals

The source has been operating under FESOP renewal 071-16197-00028, issued on March 17, 2003.

## Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on information derived from the application and additional information received on May 1, 2003, May 5, 2003, May 9, 2003, May 13, 2003, and June 13, 2003.

## Emission Calculations

### 1. Unrestricted Potential to Emit (UPTE) Due to the Modification:

The unrestricted potential to emit (UPTE) due to the proposed modification are the VOC and HAP emissions from proposed presses PS7 and PS8 and the dryer natural gas combustion emissions .

#### a. Press Emissions:

Presses PS7 and PS8 will generate VOC and HAP emissions from the use of inks, varnishes, additives, and cleanup solvents. The following calculations determine the worst case VOC UPTE and emissions after controls.

#### (1) VOC Emissions:

The following calculations determine the worst case ink, varnish, additive, and cleanup solvent combination from presses PS7 and PS8 based on the properties of the respective materials used, a maximum design line speed of 1200 feet per minute, a maximum print width of 52 inches, a maximum coverage rate of 10.4 pounds per million square inches, 100% flash-off emissions before controls, and 8760 hours of operation.

$$\begin{aligned}
 1200 \text{ ft/min} * 12 \text{ in/ft} * 60 \text{ min/hr} * 52 \text{ in} * 8760 \text{ hr/yr} * 1/1E6 \text{ MMin}^2/\text{in}^2 &= 393569.28 \text{ MMin}^2/\text{yr} \\
 \text{MMin}^2/\text{yr} * 10.4 \text{ lb/MMin}^2 * (\text{fraction VOC}) * (\text{fraction flash off}) * 1/2000 \text{ ton/lb} &= \text{tons/yr} \\
 \text{lb coating/yr} * \text{fraction VOC} * 1/2000 \text{ ton/lb} &= \text{tons/yr}
 \end{aligned}$$

#### (a) PS7:

##### Extender:

Extender	MMin <sup>2</sup> /yr	lb/MMin <sup>2</sup>	Fraction VOC	Fraction Flash Off	VOC Tons/yr
colorflex process extender	393569	10.4	0.08	1.00	<b>163.72</b>

##### Varnishes:

Extender	MMin <sup>2</sup> /yr	lb/MMin <sup>2</sup>	Fraction VOC	Fraction Flash Off	VOC Tons/yr
non-skid hydrokote varnish	393569	10.4	0.09	1.00	<b>184.19</b>
Cork ck-8138-1 varnish	393569	10.4	0.03	1.00	61.40
Colorflex varnish	393569	10.4	0.04	1.00	81.86
Colorflex soy protein varnish	393569	10.4	0.03	1.00	61.40

Cf ex y/s naphthol	393569	10.4	0.01	1.00	20.47
cf transfer varnish	393569	10.4	0.01	1.00	20.47

**Additives:**

Additives	lb/yr	Fraction VOC	VOC Tons/yr
ink cleaner	17.5	0.06	neg.
cf ll ml wax compound	174.5	0.01	neg.
anti-mottle additive	60	0.5	0.02
wb defoamer	520	0.00	0.00
amine	200	1.00	0.10
glycol	52.5	1.00	0.03
<b>Total</b>			<b>0.15</b>

**Cleanup Solvents:**

Cleanup Solvents	lb/yr	Fraction VOC	VOC Tons/yr
Chemstation 7170	500	1.00	<b>0.25</b>

**Inks:**

Ink	MMin <sup>2</sup> /yr	lb/MMin <sup>2</sup>	Fraction VOC	Fraction Flash Off	VOC Tons/yr
877u silver	393569	10.4	0.09	1.00	184.19
872u gold	393569	10.4	0.19	1.00	<b>388.85</b>
colorflex process black	393569	10.4	0.05	1.00	102.33
cf ll finished black	393569	10.4	0.02	1.00	40.93
cf ll ibp wax black	393569	10.4	0.01	1.00	20.47
cf finished white	393569	10.4	0.02	1.00	40.93
cf ex white	393569	10.4	0.02	1.00	40.93
cf ex ot yellow	393569	10.4	0.01	1.00	20.47
cf ex madras orange	393569	10.4	0.03	1.00	61.40
calcium red	393569	10.4	0.07	1.00	143.26
cf ex barium red	393569	10.4	0.01	1.00	20.47
cf ex calcium red	393569	10.4	0.02	1.00	40.93
cf ex rubine red	393569	10.4	0.04	1.00	81.86
cf ex rhodamine	393569	10.4	0.02	1.00	40.93
cf ex cyan blue	393569	10.4	0.02	1.00	40.93
cf ex g/s cyan blue	393569	10.4	0.02	1.00	40.93
cf ex b/s cyan green	393569	10.4	0.01	1.00	20.47

cf ex f/r purple	393569	10.4	0.02	1.00	40.93
cf ex methyl violet	393569	10.4	0.01	1.00	20.47
cf ex methyl violet II	393569	10.4	0.00	1.00	0.00
ce II finished black	393569	10.4	0.01	1.00	20.47
wb pantone 8002c silver	393569	10.4	0.03	1.00	61.40
cf process blue	393569	10.4	0.10	1.00	204.66
cf process yellow	393569	10.4	0.06	1.00	122.79
cf process red	393569	10.4	0.06	1.00	122.79
cf ex cyan blue base	393569	10.4	0.02	1.00	40.93

**(b) PS8:**

**Extender:**

Extender	MMin <sup>2</sup> /yr	lb/MMin <sup>2</sup>	Fraction VOC	Fraction Flash Off	VOC Tons/yr
colorflex process extender	393569	10.4	0.08	1.00	<b>163.72</b>

**Varnishes:**

Extender	MMin <sup>2</sup> /yr	lb/MMin <sup>2</sup>	Fraction VOC	Fraction Flash Off	VOC Tons/yr
non-skid hydrokote varnish	393569	10.4	0.09	1.00	<b>184.19</b>
Cork ck-8138-1 varnish	393569	10.4	0.03	1.00	61.40
Colorflex varnish	393569	10.4	0.04	1.00	81.86
Colorflex soy protein varnish	393569	10.4	0.03	1.00	61.40
cf transfer varnish	393569	10.4	0.01	1.00	20.47
cf ex y/s naphthol	393569	10.4	0.01	1.00	20.47

**Additives:**

Additives	lb/yr	Fraction VOC	VOC Tons/yr
ink cleaner	17.5	0.06	neg.
cf II ml wax compound	174.5	0.01	neg.
anti-mottle additive	60	0.5	0.02
wb defoamer	520	0.00	0.00
amine	200	1.00	0.10
glycol	52.5	1.00	0.03
<b>Total</b>			<b>0.15</b>

**Cleanup Solvents:**

Cleanup Solvents	lb/yr	Fraction VOC	VOC Tons/yr
Chemstation 7170	500	1.00	<b>0.25</b>

**Inks:**

Ink	MMin^2/yr	lb/MMin^2	Fraction VOC	Fraction Flash Off	VOC Tons/yr
877u silver	393569	10.4	0.09	1.00	184.19
872u gold	393569	10.4	0.19	1.00	<b>388.85</b>
colorflex process black	393569	10.4	0.05	1.00	102.33
cf II finished black	393569	10.4	0.02	1.00	40.93
cf II ibp wax black	393569	10.4	0.01	1.00	20.47
cf finished white	393569	10.4	0.02	1.00	40.93
cf ex white	393569	10.4	0.02	1.00	40.93
cf ex ot yellow	393569	10.4	0.01	1.00	20.47
cf ex madras orange	393569	10.4	0.03	1.00	61.40
calcium red	393569	10.4	0.07	1.00	143.26
cf ex barium red	393569	10.4	0.01	1.00	20.47
cf ex calcium red	393569	10.4	0.02	1.00	40.93
cf ex rubine red	393569	10.4	0.04	1.00	81.86
cf ex rhodamine	393569	10.4	0.02	1.00	40.93
cf ex cyan blue	393569	10.4	0.02	1.00	40.93
cf ex g/s cyan blue	393569	10.4	0.02	1.00	40.93
cf ex b/s cyan green	393569	10.4	0.01	1.00	20.47
cf ex f/r purple	393569	10.4	0.02	1.00	40.93
cf ex methyl violet	393569	10.4	0.01	1.00	20.47
cf ex methyl violet II	393569	10.4	0.00	1.00	0.00
ce II finished black	393569	10.4	0.01	1.00	20.47
wb pantone 8002c silver	393569	10.4	0.03	1.00	61.40
cf process blue	393569	10.4	0.10	1.00	204.66
cf process yellow	393569	10.4	0.06	1.00	122.79
cf process red	393569	10.4	0.06	1.00	122.79
cf ex cyan blue base	393569	10.4	0.02	1.00	40.93

The following table lists the total worst case scenario VOC UPTE from the presses.

	Ink (tons/yr)	Varnish (tons/yr)	Additives (tons/yr)	Extender (tons/yr)	Clean Solvent (tons/yr)	Total (tons/yr)
PS7	388.85	184.19	0.15	163.72	0.25	737.16
PS8	388.85	184.19	0.15	163.72	0.25	737.16
<b>Total</b>						<b>1474.32</b>

**(2) HAP Emissions:**

Cleanup solvent 7170 and SF FB FRYKOTE N.S #3 contain the hazardous air pollutant (HAP) ethylene glycol. All other materials that will be used at the proposed presses do not contain any regulated HAPs.

Ethylene glycol will be emitted from the proposed presses at a combined maximum rate of 6.00 pounds per hour.

The following calculations determine the single and combined HAP UPTe based on the estimated maximum rate of 6.00 pounds per hour, emissions before controls, and 8760 hours of operation.

$$6.00 \text{ lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 26.28 \text{ tons/yr}$$

Since only one HAP is emitted, the combined HAP emissions equal the worst case single HAP emissions.

**b. Dryer Combustion Emissions:**

The following calculations determine the dryer natural gas combustion emissions based on natural gas combustion, a combined maximum capacity of 5.6 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$5.6 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1\text{E6 MMcf/cf} * \text{Ef lb/MMcf} * 1/2000 \text{ ton/lb} = \text{ton poll/yr}$$

	PM 7.6 lb/MMcf	PM10 7.6 lb/MMcf	SO2 0.6 lb/MMcf	NOx 100 lb/MMcf	VOC 5.5 lb/MMcf	CO 84 lb/MMcf
<b>ton/yr</b>	<b>0.19</b>	<b>0.19</b>	<b>0.01</b>	<b>2.45</b>	<b>0.13</b>	<b>2.06</b>

**2. Emissions After Controls Due to the Modification:**

The press and dryer emissions are uncontrolled. Therefore, the emissions after controls equal the estimated emissions before controls.

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAP (tons/yr)
Presses	-	-	-	-	1474.32	-	26.28	26.28
Dryers	0.19	0.19	0.01	2.45	0.13	2.06	neg.	neg.
<b>Total</b>	<b>0.19</b>	<b>0.19</b>	<b>0.01</b>	<b>2.45</b>	<b>1474.45</b>	<b>2.06</b>	<b>26.28</b>	<b>26.28</b>

**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 due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.19
PM-10	0.19
SO <sub>2</sub>	0.01
VOC	1474.45
CO	2.06
NO <sub>x</sub>	2.45

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

Pollutant	Potential To Emit (tons/year)
Worst Case Single HAP	26.28
Combined HAP	26.28

The VOC UPTE due to the proposed modification (1474.45 tons/yr) is greater than the applicable level of 25 tons per year and the worst case single and combined HAP UPTE due to the modification (26.28 and 26.28 tons/yr, respectively) are greater than their respective applicable levels of 10 and 25 tons/yr.

Therefore, the proposed modification shall be permitted via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E) and (G) which states that modifications with VOC emissions greater than or equal to 25 tons/yr, worst case single HAP emissions greater than or equal to 10 tons/yr, and combined HAP emissions greater than or equal to 25 tons/yr, shall be permitted via a Significant Permit Revision.

**County Attainment Status**

The source is located in Jackson County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Jackson County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 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.

**Existing Source Status**

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document of FESOP 071-16197-00028, issued on March 17, 2003:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Printing Presses (PS1 - PS6)	-	-	-	-	99.00	-	<10	<25
Combustion	0.09	0.36	0.03	4.79	0.26	0.26	<10	neg.
<b>Total</b>	<b>0.09</b>	<b>0.36</b>	<b>0.03</b>	<b>4.79</b>	<b>99.26</b>	<b>0.26</b>	<b>&lt;10</b>	<b>&lt;25</b>

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source input VOC is limited to less than 100 tons per year.
- (b) The source single and combined HAP input are limited to less than 10 and 25 tons per year, respectively.
- (c) The existing source is not a major PSD stationary source because no regulated pollutant emissions are greater than their respective major source levels and the source is not one of the 28 listed source categories.
- (d) The existing source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

### Source Emissions After the Modification

Source PTE after the proposed modification (emissions after controls, based upon 8760 hours of operation per year, including all existing and proposed equipment, and all applicable limits and requirements):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Existing Presses	-	-	-	-	99.00	-	<10	<25
Existing Combustion	0.09	0.36	0.03	4.79	0.26	0.26	neg.	neg.
Proposed Presses	-	-	-	-	-	-	-	-
Proposed Combustion	0.19	0.19	0.01	2.45	0.13	2.06	-	-
<b>Total</b>	<b>0.28</b>	<b>0.55</b>	<b>0.04</b>	<b>7.24</b>	<b>99.39</b>	<b>2.32</b>	<b>&lt;10</b>	<b>&lt;25</b>

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The input VOC, single HAP input, and combined HAP input from the proposed presses are included with the existing press VOC, single HAP, and combined HAP input limits. Therefore, no input VOCs or HAPs are identified for the proposed presses.
- (b) The source input VOC will still be limited to less than 100 tons per year.
- (c) The source single and combined HAP input will still be limited to less than 10 and 25 tons per year, respectively.
- (d) The source after the proposed modification is still not a major PSD stationary source because no regulated pollutant emissions are greater than their respective major source levels and the source is not one of the 28 listed source categories.
- (e) The source after the proposed modification is still not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

### Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart QQ (Standards of Performance for the Graphics Arts Industry: Publications Rotogravure Printing) are not applicable to the existing or proposed presses because this rule applies to rotogravure printing presses. The existing and proposed presses are not rotogravure presses.
- (b) 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) applies to the existing and proposed presses because the source is an area source as described in 40 CFR 63.820(a)(2) and these presses each meet the definition of a wide-web flexographic press as described in 40 CFR 63.822.

Pursuant to 40 CFR 63.820(a)(3), since the source is an area source, the existing and proposed presses are not subject to any emission limitations. Instead, they are subject to 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records needed to demonstrate that the source is an area source. These records shall include the following:

- (1) the mass of all HAP containing materials used, and
- (2) the mass fraction of HAP present in each HAP containing material used on a monthly basis.

Pursuant to 40 CFR 63.830(b)(1), the Permittee shall submit an initial notification as required in 40 CFR 63.9(b).

- (c) This source is still not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:

- (1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant,
- (2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and
- (3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source.

Existing presses PS1 and PS2 and proposed presses PS7 and PS8, each, have VOC potential to emit greater than one hundred (100) tons per year. However, these units do not use a control device to meet any emission limitation. Therefore, the existing units are not subject to the CAM provisions.

Existing Presses PS3, PS4, PS5, and PS6 each have PTE less than 100 tons/yr.

- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are still not applicable to this source because the source single and combined HAP emissions are still limited to less than 10 and 25 tons per year, respectively, and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.
- (e) National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating Subpart JJJJ (40 CFR 63.3280 - .3420) does not apply to this source. It does not apply because one; the source is a minor source of HAPs and two; the source category is already covered under Subpart KK.

#### **State Rule Applicability - Entire Source**

##### **(a) 326 IAC 2-2 (Prevention of Significant Deterioration):**

The VOC input to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8, combined, will be limited to less than or equal to ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit combined with the other source VOC PTE, reduces the source VOC emissions to less than 250 tons per year.

No other criteria pollutant emissions exceed 250 tons per year. The source is not one of the 28 listed source categories.

Therefore, the PSD requirements under 326 IAC 2-2 do not apply.

**(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants):**

The source single and combined HAP emissions will still be limited to less than their respective major source levels of 10 and 25 tons per year.

Therefore, the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) still do not apply.

**(c) 326 IAC 2-6 (Emission Reporting):**

The requirements of 326 IAC 2-6 still do not apply because the source PM10, SO2, NOx, VOC, and CO emissions are less than their respective Jackson County applicable level of 100 tons per year.

**(d) 326 IAC 2-7 (Part 70 Requirements):**

The VOC input to PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8, combined, will be limited to less than or equal to ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit combined with the other source VOC PTE, reduces the source VOC emissions to less than 100 tons per year.

No other criteria pollutant emissions exceed 100 tons per year.

In addition, the source single and combined HAP emissions will still be limited to less than their respective major source levels of 10 and 25 tons per year.

Therefore, the Part 70 major source requirements under 326 IAC 2-7 still do not apply.

**(e) 326 IAC 2-8-4(9) (Preventive Maintenance Plan):**

The preventive maintenance plan requirements under 326 IAC 2-8-4(9) still apply. The proposed equipment will not affect the status of these requirements.

**(f) 326 IAC 4-1 (Open Burning):**

The requirements of 326 IAC 4-1 still apply to the source. The proposed equipment will not affect the status of these requirements.

**(g) 326 IAC 4-2 (Incineration):**

The requirements of 326 IAC 4-2 still apply to the source. The proposed equipment will not affect the status of these requirements.

**(h) 326 IAC 5 (Opacity):**

The requirements of 326 IAC 5 still apply to the source. The proposed equipment will not affect the status of these requirements.

**(i) 326 IAC 6-4 (Fugitive Dust Emissions):**

The requirements of 326 IAC 6-4 still apply to the source. The proposed equipment will not affect the status of these requirements.

**State Rule Applicability - Printing Presses (PS1, PS2, PS3, PS4, PS5, PS6, PS7, and PS8)**

**(a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes):**

The requirements of 326 IAC 6-3 do not apply to the proposed presses because the inks are applied using roll coating, one of the exemptions listed in 326 IAC 6-3-1(b).

Under the FESOP renewal review, it was determined that the old 326 IAC 6-3-2 requirements did not apply to the existing presses (PS1, PS2, PS3, PS4, PS5, and PS6) and that the new 326 IAC 6-3 rules would be applied under the first review after the rule became effective.

This proposed Significant Permit Revision is the first review after the rule became effective. Thus, the applicability of the new 326 IAC 6-3 requirements shall be determined under this review.

The new 326 IAC 6-3 requirements do not apply to existing presses PS1, PS2, PS3, PS4, PS5, and PS6 because these presses apply ink using roll coating, one of the exemptions under 326 IAC 6-3-1(b).

**(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements):**

Although the potential VOC emissions from presses PS7 and PS8 are greater than the applicable level of 25 tons per year, 326 IAC 8-1-6 does not apply because the presses are subject to the requirements of 326 IAC 8-5-5.

**(c) 326 IAC 8-2-5 (Paper Coating Operations):**

The requirements of 326 IAC 8-2-5 do not apply to presses PS7 and PS8 because the presses are subject to the requirements of 326 IAC 8-5-5.

**(d) 326 IAC 8-5-5 (Graphics Arts Operations):**

Presses PS7 and PS8 are subject to the requirements of 326 IAC 8-5-5 because they will be constructed after 1980.

Pursuant to 326 IAC 8-5-5:

- (a) The ink as it is applied to the substrate, less water, shall contain, sixty percent (60%) by volume or more nonvolatile material; or
- (b) The volatile fraction of the ink, as it is applied to the substrate, less water, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

Based on the Material Safety Data Sheets (MSDS) and the calculations, the printing presses are in compliance with this requirement.

**(e) 326 IAC 8-6 (Organic Solvent Emission Limitations):**

Although the source was constructed after 1980, the requirements of 326 IAC 8-6 still do not apply because the source VOC emissions are still limited to less than the applicable level of 100 tons per year.

**(f) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties):**

The requirements of 326 IAC 8-7 still do not apply because the source is not located in any of the applicable counties (Lake, Porter, Clark, or Floyd).

**Changes to the Permit**

**1. Condition A.2:**

The unit description of Condition A.2 shall be changed as follows to add the equipment of the proposed modification.

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) Flexoline 8 color flexographic printing press, identified as PS1, constructed in 1986, with a maximum line speed of 1,200 feet per minute for ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack, identified as S2, and two (2) vents, identified as V3 and V4.
- (b) One (1) Flexoline 4 color flexographic printing press, identified as PS2, constructed in 1988, with a maximum line speed of 1,100 feet per minute, exhausting to two (2) vents, identified as V5 and V6.
- (c) One (1) Union Camp 2 color flexographic printing press, identified as PS3, constructed in 1996, with a maximum line speed of 500 feet per minute.
- (d) One (1) Advance Machine Technology one color flexographic printing press, identified as PS4, constructed in 1989, with a maximum line speed of 500 feet per minute.
- (e) One (1) two-color flexographic tail-end printing press, constructed in 2002, identified as PS5, with a maximum capacity of 155 pounds per hour of ink and varnish and with a maximum throughput of 44,700 square inches of paper per hour, exhausting to vent V5.
- (f) One (1) portable, two-color flexographic tail-end printing press, constructed in 2002, identified as PS6, with a maximum capacities of 155 pounds per hour of ink and varnish and will a maximum throughput of 44,700 square inches of paper per hour, exhausting to V6.
- (g) One (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7.**

- (h) One (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.**

## 2. Unit Description of Section D.1

The unit description of Section D.1 shall be changed as follows to add the equipment of the proposed modification.

### SECTION D.1 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10): Printing Presses

- (a) One (1) Flexoline 8 color flexographic printing press, identified as PS1, constructed in 1986, with a maximum line speed of 1,200 feet per minute for ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack, identified as S2, and two (2) vents, identified as V3 and V4.
- (b) One (1) Flexoline 4 color flexographic printing press, identified as PS2, constructed in 1988, with a maximum line speed of 1,100 feet per minute, exhausting to two (2) vents, identified as V5 and V6.
- (c) One (1) Union Camp 2 color flexographic printing press, identified as PS3, constructed in 1996, with a maximum line speed of 500 feet per minute.
- (d) One (1) Advance Machine Technology one color flexographic printing press, identified as PS4, constructed in 1989, with a maximum line speed of 500 feet per minute.
- (e) One (1) two-color flexographic tail-end printing press, constructed in 2002, identified as PS5, with a maximum capacity of 155 pounds per hour of ink and varnish and with a maximum throughput of 44,700 square inches of paper per hour, exhausting to vent V5.
- (f) One (1) portable, two-color flexographic tail-end printing press, constructed in 2002, identified as PS6, with a maximum capacities of 155 pounds per hour of ink and varnish and will a maximum throughput of 44,700 square inches of paper per hour, exhausting to V6.
- (g) One (1) PCMC 6842 8 color flexographic press, identified as PS7, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with four (4) natural gas fired dryers with a combined capacity of 2.4 MMBtu/hr, with all emissions exhausted through Stack S7.**
- (h) One (1) Comexi FX2108 CNC 8 color flexographic press, identified as PS8, with a maximum design throughput rate of 1200 feet per minute and a maximum design printing width of 52 inches, equipped with one (1) 0.8 MMBtu/hr natural gas fired dryer and two (2) 1.2 MMBtu/hr natural gas fired dryers, with all emissions exhausted through Stack S8.**

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

**3. Condition D.1.1:**

Condition D.1.1 shall be changed as follows to add presses PS7 and PS8.

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to flexographic presses PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8**, except when otherwise specified in 40 CFR 63, Subpart KK.

**4. Condition D.1.2:**

Condition D.1.2 shall be changed as follows to add presses PS7 and PS8.

D.1.2 Printing and Publishing Industry [326 IAC 20] [40 CFR 63, Subpart KK]

Flexographic presses PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8** are subject to the requirements of 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). There are no emission limitations applicable to these units. Record keeping requirements applicable to these units are included in Condition D.1.812 of this section.

**5. Condition D.1.3:**

Condition D.1.3 shall be changed as follows to add presses PS7 and PS8 and clarify the condition.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-8]

The VOC input to PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8** combined, shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is structured such that, when including the emissions from the insignificant activities, ~~the~~ source total VOC emissions remain less than one hundred (100) tons per year. Compliance with this limitation renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), ~~40 CFR 52.21~~, and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

**6. Condition D.1.4:**

Condition D.1.4 shall be changed as follows to add presses PS7 and PS8.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

- (a) The input of a single HAP to PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8** shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit restricts the single HAP emissions from the source to less than ten (10) tons per year.
- (b) The input of any combination of HAPs to PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8** shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit restricts the emissions of any combination of HAPs from the source to less than twenty-five (25) tons per year.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

## 7. Condition D.1.5:

Condition D.1.5 shall be changed as follows to add presses PS7 and PS8.

### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), for flexographic presses PS1, PS2, PS3, PS4, PS5, ~~and PS6~~, **PS7, and PS8**:

- (a) The ink as it is applied to the substrate, less water, shall contain, sixty percent (60%) by volume or more nonvolatile material; or
- (b) The volatile fraction of the ink, as it is applied to the substrate, less water, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

## 8. Condition D.1.7:

Existing Condition D.1.7 states that as applied and as supplied VOC data sheets can be used to determine compliance with the limits of Conditions D.1.3 and D.1.4. Conditions D.1.3 and D.1.4 limit input VOCs and HAPs. While the VOC data sheets do provide some information that can be used to determine the input VOCs, the VOC data sheets do not provide any information on the amount used.

In addition, the VOC data sheets do not provide any HAP information that can be used to determine the input HAP emissions.

Finally, 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a) pertain to content limits specified in 326 IAC 8 and are not necessary when determining the input VOCs that will be compared to the respective limits of Conditions D.1.3 and D.1.4.

Therefore, the following changes shall be made to correct the stated problems.

Existing Condition D.1.7 shall be changed as follows to specify what needs to be determined to establish the input VOCs.

### D.1.7 Volatile Organic Compound (VOC) Input Limit ~~and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer copies of the "as-supplied" and "as-applied" VOC data sheets. IDEM, OAG, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

**To determine compliance with the VOC limit of Condition D.1.3, the owner or operator shall on a monthly basis:**

- (a) **draft a list of all inks, varnishes, additives, and solvents used that contain VOCs;**
- (b) **determine the following for each ink, varnish, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data obtained from the respective material safety data sheets (MSDS) and the applicable purchase orders, invoices, and source inventories for the most recent month:**

- (1) the material density,
- (2) the VOC fraction,
- (3) the amount of material used, and
- (4) the input VOC;

(c) determine the sum total ink, varnish, additive, and solvent input VOC for the month;

(d) determine the sum total input VOC from the previous 11 months; and

(e) determine the 12 month rolling total input VOC.

**9. New Condition D.1.8:**

New Condition D.1.8 shall be added to specify what needs to be determined to establish the single and combined input HAPs.

**D.1.8 Hazardous Air Pollutant (HAP) Input Limits**

To determine compliance with the HAP limits of Conditions D.1.2 and D.1.4, the owner or operator shall on a monthly basis:

(a) draft a list of all inks, varnishes, additives, and solvents used that contain HAPs, and for each HAP containing ink, varnish, additive, and solvent, a list of the HAPs contained in the material;

(b) determine the following for each HAP of each ink, varnish, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data obtained from the respective material safety data sheets (MSDS) and the applicable purchase orders, invoices, and source inventories for the most recent month:

- (1) the material density,
- (2) the HAP fraction,
- (c) the amount of material used, and
- (4) the input HAP for each HAP;

(c) determine the sum total individual input HAP for the month;

(d) determine the sum total combined input HAP for the month;

(e) determine the sum total individual input HAP from the previous 11 months;

(f) determine the sum total combined input HAP from the previous 11 months;

(g) determine the 12 month rolling total individual input HAP,

(h) determine the worst case 12 month rolling total individual input HAP from the input HAPs listed in Part (g) of this Condition, and

(i) determine the 12 month rolling total combined input HAP.

#### **10. New Condition D.1.9:**

New Condition D.1.9 shall be added to include the determination requirements that apply to the 326 IAC 8-5-5 content limits of Condition D.1.5.

##### **D.1.9 Volatile Organic Compound Content (VOC)**

**To determine compliance with the VOC content limitations contained in Condition D.1.5, the owner or operator shall:**

- (a) comply with the applicable requirements of 326 IAC 8-1-2 and 326 IAC 8-1-4, or**
- (b) prepare or obtain from the manufacturer, copies of the “as supplied” and “as applied” VOC data sheets.**

**However, the IDEM, OAQ, reserves at all times, the authority to require the owner or operator to determine compliance pursuant to the requirements specified in Part (a) of this Condition if deemed necessary.**

#### **11. New Condition D.1.10:**

New Condition D.1.10 shall be added to include the monitoring requirements associated with Conditions D.1.7 and D.1.8.

##### **D.1.10 VOC and HAP Input Limits**

**To demonstrate compliance with the VOC and HAP input limits of Conditions D.1.2, D.1.3 and D.1.4, the owner or operator shall record the information required in Conditions D.1.7 and D.1.8.**

#### **12. New Condition D.1.11:**

New Condition D.1.11 shall be added to include the monitoring requirements associated with Condition D.1.9.

##### **D.1.11 VOC Content**

**To demonstrate compliance with the VOC content limits of Condition D.1.5, the owner or operator shall comply with one (1) of the following.**

- (a) If compliance is being demonstrated using the methods specified in Part (a) of Condition D.1.9, the owner or operator shall, on a monthly basis, record the applicable 326 IAC 8-1-2 and 326 IAC 8-1-4 methods used to achieve compliance, including in the record as applicable, all test methods used, a description of the test protocol and procedures followed, the test parameters used, the data collected, a summary of the results, and a description demonstrating that compliance with the requirements has been achieved.**
- (b) If compliance is being demonstrated using the method specified in Part (b) of Condition D.1.9, the owner or operator shall maintain and update on a monthly basis, the required “as applied” and “as supplied” VOC data sheets.**

### 13. Existing Condition D.1.8:

Existing Condition D.1.8 (now Condition D.1.12) shall be changed as follows to reflect the updated record keeping requirements.

#### D.1.812 Record Keeping Requirements

- ~~(a) Pursuant to 40 CFR 63, Subpart KK, the Permittee shall maintain records needed to demonstrate that the source is an area source. These records shall include the mass of all HAP containing material used and the mass fraction of HAP present in each HAP containing material used on a monthly basis.~~
- ~~(b) To document compliance with Conditions D.1.3, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP content limits and the VOC and HAP input limits established in Conditions D.1.3, D.1.4, and D.1.5, and shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.~~
- ~~(1) The VOC and HAP content of each coating material and solvent used.~~
- ~~(2) The amount of coating material and solvent used on a monthly basis:~~
- ~~—(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- ~~—(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~
- ~~(3) The monthly cleanup solvent usage.~~
- ~~(4) The total VOC and HAP usage for each month.~~
- (a) To document compliance with the requirements of Conditions D.1.2, D.1.3, and D.1.4, the owner or operator shall keep records of the information recorded in Conditions D.1.10 and copies of all supporting documentation including all applicable purchase orders, invoices, source inventories, MSDS, and all other documentation used to determine the input VOCs and HAPs required in Conditions D.1.7 and D.1.8.**
- (b) To document compliance with the requirements of Condition D.1.5, the owner or operator shall, as applicable, keep records of the information required in Condition D.1.11.**
- ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

### 14. Existing Condition D.1.13:

Condition D.1.9 (now Condition D.1.13) shall be amended as follow to correct a typographical error.

**D.1.913 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**15. VOC Quarterly Report:**

The VOC quarterly report shall be changed as follows to add presses PS7 and PS8.

.....

Facility: PS1, PS2, PS3, PS4, PS5, ~~and~~ PS6, **PS7, and PS8**  
 Parameter: VOC input  
 Limit: The VOC input to PS1, PS2, PS3, PS4, PS5, ~~and~~ PS6, **PS7, and PS8** combined, shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**16. Single HAP Quarterly Report:**

The HAP quarterly report shall be changed as follows to add presses PS7 and PS8, and to create a form specifically designed to establish compliance with the estimated worst case individual input HAP.

.....

Facility: PS1, PS2, PS3, PS4, PS5, ~~and~~ PS6, **PS7, and PS8**  
 Parameter: **Single** HAP input  
 Limit: The input of a single HAP to PS1, PS2, PS3, PS4, PS5, ~~and~~ PS6, **PS7, and PS8** shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Total HAP	Single HAP	Total HAP	<b>Worst Case Single HAP</b>	Total HAP
Month 1						
Month 2						
Month 3						

		(Column 1) Emissions This Month (tons)	(Column 2) Emissions Previous 11 Months (tons)	(Column 1 + Column 2) Worst Case Single HAP Emissions (tons)
Month 1				
Month 2				
Month 3				

**17. New Combined HAP Quarterly Report**

A new combined HAP quarterly report shall be added to establish a separate form for the estimated combined input HAPs.

**18. Table of Contents:**

The Table of Contents shall be amended to reflect the changes to the Section D.1 numbering.

**Conclusion**

The proposed presses and their associated dryers shall be constructed and operated under the requirements of the existing operating permit and this proposed Significant Permit Revision.