INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Printpack, Inc.
1505 West Main Street
Greensburg, Indiana 47240

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.: T031-17541-00001	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary printed plastic bag and plastic film production process.

Source Address:	1505 West Main Street, Greensburg, Indiana 47240
Mailing Address:	4335 Wendell Drive Atlanta, GA 30336
General Source Phone Number:	(812) 663-5091
SIC Code:	2673 and 3081
County Location:	Decatur
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

(a) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1963. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(b) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1966. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(c) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1969. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(d) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1967. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(e) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1970. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(f) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute. This facility was constructed in 1980. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(g) One (1) four-color flexographic printing press, identified as P12, using a natural gas-fired catalytic oxidizer, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(h) One (1) four-color flexographic printing press, identified as P13, using a natural gas-fired catalytic oxidizer, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(i) One (1) six-color flexographic printing press, identified as P14, using a natural gas-fired catalytic oxidizer, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(j) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas-fired catalytic oxidizer, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1991. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(k) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas-fired catalytic oxidizer, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1995. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(l) One (1) flexographic printing press, identified as P17, using permanent total enclosure and a natural gas-fired drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute. This facility was constructed in 1999. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(m) One (1) manual parts washer system, PW1, with a maximum capacity of 36.7 gallons per ray, using no control, and exhausting to stack SW1. This facility was constructed in 2000.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

(a) Other activities or categories not previously identified, below insignificant thresholds:

(8) Maintenance shop activities such as welding and grinding and buffing [326 IAC 6-3-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T031-17541-00001, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) The emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) The "responsible official" is defined at 326 IAC 2-7-1(34)

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.
The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed

compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T031-17541-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40) The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2 (for sources located in NA areas).

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on 1/1/1999.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan[326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimzing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excuresion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) intial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 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]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.
(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;
(ii) Projected actual emissions;
(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1963. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(b) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1966. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(c) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1969. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(d) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1967. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(e) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1970. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(f) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute. This facility was constructed in 1980. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(g) One (1) four-color flexographic printing press, identified as P12, using a natural gas-fired catalytic oxidizer, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(h) One (1) four-color flexographic printing press, identified as P13, using a natural gas-fired catalytic oxidizer, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(i) One (1) six-color flexographic printing press, identified as P14, using a natural gas-fired catalytic oxidizer, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(j) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas-fired catalytic oxidizer, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and

the maximum output is 1000 feet per minute. This facility was constructed in 1991. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(k) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas-fired catalytic oxidizer, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1995. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(l) One (1) flexographic printing press, identified as P17, using permanent total enclosure and a natural gas-fired drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute. This facility was constructed in 1999. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(The information describing the process contained in this emissions unit 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 Compound (VOC) [326 IAC 8-5-5]

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

(a) For printing presses P12, P13, P14, P15, P16, and P17 catalytic incineration is required. The capture system shall maintain an overall control efficiency of 60% or greater.

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

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1]

The Permittee shall limit the single worst case HAP emissions and combination HAP emissions from printing presses P12, P13, P14, P15, P16 , and P17 to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 2-2-1]

The Permittee shall limit VOC usage as follows:

(a) The annual VOC input to Presses P12 and P13 shall be limited such that the potential to emit does not exceed 176 tons per year, considering the most recent determination of capture and destruction.

Pursuant to OP 16-04-87-0048, issued on February 5, 1986, the catalytic oxidizer (OX12 or OX13) for VOC control shall be in operation at all times when the respective presses (P12 or P13) are in operation.

(b) The annual VOC input to Press P14 shall be limited such that the potential to emit does not exceed 60 tons per year, considering the most recent determination of capture and destruction.

Pursuant to OP 16-04-87-0049, issued on February 5, 1986, the catalytic oxidizer (OX14) for VOC control shall be in operation at all times when the press (P14) is in operation.

(c) The annual VOC input to Press P15 shall be limited such that the potential to emit does not exceed 39 tons, considering the most recent determination of capture and destruction.

Pursuant to CP 031-2102-00001, issued on July 31, 1991, the catalytic oxidizer (OX15) for VOC control shall be in operation at all times when the press (P15) is in operation.

(d) The annual VOC input to Press P16 shall be limited such that the potential to emit does not exceed 39 tons per year, considering the most recent determination of capture and destruction.

Pursuant to CP 031-3576-00001, issued on September 12, 1994, the catalytic oxidizer (OX16) for VOC control shall be in operation at all times when the press (P16) is in operation.

(e) The annual VOC input to Press P17 shall be limited such that the potential to emit does not exceed 35.44 tons per year, considering the most recent determination of capture and destruction.

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

Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency)).

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Baseline capture efficiency tests have been completed for all of the installed controlled presses (P12, P13, P14, P15, P16, and P17). Capture efficiency tests shall be repeated within one hundred eighty (180) days of a fundamental change, which may be indicated by operating parameters, and may include any of the following:

(1) Adding print stations to a press;

(2) Increasing or decreasing the volumetric flow rate from the dryer; or

(3) Changing the static duct pressure.

All testing shall be done in accordance with Section C – Performance Testing.

(b) Compliance stack tests shall be performed to determine the minimum operating temperature that will achieve at least a 90% destruction efficiency and to achieve

compliance with 326 IAC 8-5-5. The last compliance test for each press oxidizer was January 2004. Every five (5) years stack tests shall be performed.

(1) The Permittee shall perform one VOC destruction test on either Press P12 or Press P13, as selected by IDEM, OAQ on or before January 2009.

(2) The Permittee shall perform one VOC destruction test on each of the following Presses P14, P15, P16, P17 on or before January 2009.

(3) The Permittee shall verify the Permanent Total Enclosure ("PTE") associated with Presses P15 and P17 meet the EPA Method 204 design criteria. The baseline verification shall be performed once. The Permittee shall repeat re-verify the PTE if any modifications are made to the capture system that potentially cause the PTE to fail to meet the EPA Method 204 design criteria.

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

D.1.7 Thermal Oxidizer Temperature

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer systems (OX12, OX13, OX14, OX15, and OX16) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the catalytic oxidizers at or above the 3-hour average inlet temperature of 550°F used to demonstrate compliance with Condition D.1.6, as verified during the most recent compliance test approved by IDEM.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the oxidizer systems are in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.1.9 Record Keeping Requirement

(a) To document compliance with Condition D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with Conditions D.1.1 and D.1.3.

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

(2) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);

(3) The calculated weight of VOCs emitted for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));

(4) The calculated 12 month rolling sum of 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

(7) Parametric monitoring records required under section D.1.6.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the continuous temperature records for the catalytic incinerator. The Permittee shall include in its records the temperature used to demonstrate compliance during the most recent compliance stack test.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the fan amperage. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of an amperage reading (e.g. the process did not operate that day).

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.11 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart KK]

(a) Pursuant to 40 CFR 63.820(a)(2), the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facilities described in this section, as specified in Appendix A of 40 CFR 63, Subpart KK, in accordance with schedule in 40 CFR 63, Subpart KK.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204

D.1.12 National Emissions Standards for Hazardous Air Pollutants for The Printing and Publishing Industry [40 CFR Part 63, Subpart KK]

Pursuant to 40 CFR Part 63, Subpart KK the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart KK, which are incorporated by reference as 326 IAC 20-18 for the flexographic press operations as follows:

D.1.13 One Time Deadlines Relating to NESHAP Subpart KK

The Permittee shall with the following requirements by the dates listed below:

Requirement	Rule Citation	Affected Facility	Deadline
Compliance Dates	40 CFR 63.826 (b)	New & Reconstructed	Immediately after construction.
Submit Initial Notification	40 CFR 63.830(b)	New & Reconstructed	With construction permit application

Subpart KK—National Emission Standards for the Printing and Publishing Industry

Source: 61 FR 27140, May 30, 1996, unless otherwise noted.

§ 63.820 Applicability.

(a) The provisions of this subpart apply to:

(1) Each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated, and

(2) Each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of paragraphs (a)(2)(i) and (ii) of this section for purposes of establishing the facility to be an area source of HAP with respect to this subpart. A facility which establishes area source status through some other mechanism, as described in paragraph (a)(7) of this section, is not subject to the provisions of this subpart.

(i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

(3) Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this section shall be considered an area source, and is subject only to the provisions of §63.829(d) and §63.830(b)(1) of this subpart.

(4) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).

(5) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section to become an area source, but subsequently exceeds either of the thresholds in paragraph (a)(2) of this section for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of this subpart as noted in paragraph (a)(1) of this section and would no longer be eligible to use the provisions of paragraph (a)(2) of this section, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in paragraph (a)(2) of this section.

(6) An owner or operator of an affected source subject to paragraph (a)(2) of this section who chooses to no longer be subject to paragraph (a)(2) of this section shall notify the Administrator of such change. If, by

no longer being subject to paragraph (a)(2) of this section, the facility at which the affected source is located becomes a major source:

(i) The owner or operator of an existing source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for existing affected sources under this subpart;

(ii) The owner or operator of a new source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for new affected sources under this subpart.

(7) Nothing in this paragraph is intended to preclude a facility from establishing area source status by limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(b) This subpart does not apply to research or laboratory equipment.

[61 FR 27140, May 30, 1996, as amended at 71 FR 29799, May 24, 2006]

§ 63.822 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A of this part.

Always-controlled work station means a work station associated with a dryer from which the exhaust is delivered to a control device, with no provision for the dryer exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Capture efficiency means the fraction of all organic HAP emissions generated by a process that are delivered to a control device, expressed as a percentage.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions into a closed-vent system that exhausts to a control device.

Car-seal means a seal that is placed on a device that is used to change the position of a valve or damper (e.g., from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

Certified product data sheet (CPDS) means documentation furnished by suppliers of inks, coatings, varnishes, adhesives, primers, solvents, and other materials or by an independent third party that provides the organic HAP weight fraction of these materials determined in accordance with §63.827(b), or the volatile matter weight fraction or solids weight fraction determined in accordance with §63.827(c). A material safety data sheet (MSDS) may serve as a CPDS provided the MSDS meets the data requirements of §63.827(b) and (c). The purpose of the CPDS is to assist the owner or operator in demonstrating compliance with the emission limitations presented in §§63.824–63.825.

Coating means material applied onto or impregnated into a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, solvent-borne coatings, waterborne coatings, wax coatings, wax laminations, extrusion coatings, extrusion laminations, 100 percent solid adhesives, ultra-violet cured coatings, electron beam cured coatings, hot melt coatings, and cold seal coatings. Materials used to form unsupported substrates such as calendaring of vinyl, blown film, cast film, extruded film, and coextruded film are not considered coatings.

Control device means a device such as a carbon adsorber or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

Control device efficiency means the ratio of organic HAP emissions recovered or destroyed by a control device to the total organic HAP emissions that are introduced into the control device, expressed as a percentage.

Day means a 24-consecutive-hour period.

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

Flexible packaging means any package or part of a package the shape of which can be readily changed. Flexible packaging includes, but is not limited to, bags, pouches, labels, liners and wraps utilizing paper, plastic, film, aluminum foil, metalized or coated paper or film, or any combination of these materials.

Flexographic press means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work stations, one or more of which is a flexographic print station, any dryers (including interstage dryers and overhead tunnel dryers) associated with the work stations, and a rewind, stack, or collection section. The work stations may be oriented vertically, horizontally, or around the circumference of a single large impression cylinder. Inboard and outboard work stations, including those employing any other technology, such as rotogravure, are included if they are capable of printing or coating on the same substrate. A publication rotogravure press with one or more flexographic imprinters is not a flexographic press.

Flexographic print station means a print station on which a flexographic printing operation is conducted. A flexographic print station includes an anilox roller that transfers material to a raised image (type or art) on a plate cylinder. The material is then transferred from the image on the plate cylinder to the web or sheet to be printed. A flexographic print station may include a fountain roller to transfer material from the reservoir to the anilox roller, or material may be transferred directly from the reservoir to the anilox roller. The materials applied are of a fluid, rather than paste, consistency.

HAP applied means the organic HAP content of all inks, coatings, varnishes, adhesives, primers, solvent, and other materials applied to a substrate by a product and packaging rotogravure or wide-web flexographic printing affected source.

HAP used means the organic HAP applied by a publication rotogravure printing affected source, including all organic HAP used for cleaning, parts washing, proof presses, and all organic HAP emitted during tank loading, ink mixing, and storage.

Intermittently-controllable work station means a work station associated with a dryer with provisions for the dryer exhaust to be delivered to or diverted from a control device depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Month means a calendar month or a prespecified period of 28 days to 35 days.

Narrow-web flexographic press means a flexographic press that is not capable of printing substrates greater than 18 inches in width and that does not also meet the definition of rotogravure press (i.e., it has no rotogravure print stations).

Never-controlled work station means a work station which is not equipped with provisions by which any emissions, including those in the exhaust from any associated dryer, may be delivered to a control device.

Other press means a lithographic press, letterpress press, or screen printing press that does not meet the definition of rotogravure press or flexographic press (i.e., it has no rotogravure print stations and no flexographic print stations), and that does not print on fabric or other textiles as defined in the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP (40 CFR part 63, subpart OOOO), wood furniture components as defined in the Wood Furniture Manufacturing Operations NESHAP (40 CFR part 63, subpart JJ) or wood building products as defined in the Surface Coating of Wood Building Products NESHAP (40 CFR part 63, subpart QQQQ).

Overall Organic HAP control efficiency means the total efficiency of a control system, determined either by:

(1) The product of the capture efficiency and the control device efficiency or

(2) A liquid-liquid material balance.

Print station means a work station on which a printing operation is conducted.

Printing operation means the formation of words, designs, or pictures on a substrate other than wood furniture components as defined in the Wood Furniture Manufacturing Operations NESHAP (40 CFR part 63, subpart JJ), wood building products as defined in the Surface Coating of Wood Building Products NESHAP (40 CFR part 63, subpart QQQQ), and fabric or other textiles as defined in the Printing, Coating, and Dyeing of Fabric and Other Textiles NESHAP (40 CFR part 63, subpart OOOO), except for fabric or other textiles for use in flexible packaging.

Product and packaging rotogravure printing means the production, on a rotogravure press, of any printed substrate not otherwise defined as publication rotogravure printing. This includes, but is not limited to, folding cartons, flexible packaging, labels and wrappers, gift wraps, wall and floor coverings, upholstery, decorative laminates, and tissue products.

Proof press means any press which prints only non-saleable items used to check the quality of image formation of rotogravure cylinders or flexographic plates; substrates such as paper, plastic film, metal foil, or vinyl; or ink, coating varnish, adhesive, primer, or other solids-containing material.

Publication rotogravure press means a rotogravure press used for publication rotogravure printing. A publication rotogravure press may include one or more flexographic imprinters. A publication rotogravure press with one or more flexographic imprinters is not a flexographic press.

Publication rotogravure printing means the production, on a rotogravure press, of the following saleable paper products:

(1) Catalogues, including mail order and premium,

(2) Direct mail advertisements, including circulars, letters, pamphlets, cards, and printed envelopes,

(3) Display advertisements, including general posters, outdoor advertisements, car cards, window posters; counter and floor displays; point of purchase and other printed display material,

(4) Magazines,

(5) Miscellaneous advertisements, including brochures, pamphlets, catalog sheets, circular folders, announcements, package inserts, book jackets, market circulars, magazine inserts, and shopping news,

(6) Newspapers, magazine and comic supplements for newspapers, and preprinted newspaper inserts, including hi-fi and spectacolor rolls and sections,

(7) Periodicals, and

(8) Telephone and other directories, including business reference services.

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Rotogravure press means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work stations, one or more of which is a rotogravure print station, any dryers associated with the work stations, and a rewind, stack, or collection section. Inboard and outboard work stations, including those employing any other technology, such as flexography, are included if they are capable of printing or coating on the same substrate.

Rotogravure print station means a print station on which a rotogravure printing operation is conducted. A rotogravure print station includes a rotogravure cylinder and supply for ink or other solids containing material. The image (type and art) to be printed is etched or engraved below the surface of the rotogravure cylinder. On a rotogravure cylinder the printing image consists of millions of minute cells.

Stand-alone equipment means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator); a series of one or more work stations and any associated dryers; and a rewind, stack, or collection section that is not part of a product and packaging rotogravure or wide-web flexographic press. Stand-alone equipment is sometimes referred to as “off-line” equipment.

Wide-web flexographic press means a flexographic press capable of printing substrates greater than 18 inches in width.

Work station means a unit on which material is deposited onto a substrate.

(b) The symbols used in equations in this subpart are defined as follows:

(1) C_{ahi}=the monthly average, as-applied, organic HAP content of solids-containing material, i, expressed as a weight-fraction, kg/kg.

(2) C_{asi}=the monthly average, as applied, solids content, of solids-containing material, i, expressed as a weight-fraction, kg/kg.

(3) C_{hi}=the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg.

(4) C_{hij}=the organic HAP content of solvent j, added to solids-containing material i, expressed as a weight-fraction, kg/kg.

(5) C_{hj}=the organic HAP content of solvent j, expressed as a weight-fraction, kg/kg.

(6) [Reserved]

(7) C_{si}=the solids content of ink or other material, i, expressed as a weight-fraction, kg/kg.

(8) C_{vi}=the volatile matter content of ink or other material, i, expressed as a weight-fraction, kg/kg.

(9) E=the organic volatile matter control efficiency of the control device, percent.

(10) F=the organic volatile matter capture efficiency of the capture system, percent.

(11) G_i=the mass fraction of each solids containing material, i, which was applied at 20 weight-percent or greater solids content, on an as-applied basis, kg/kg.

(12) H = the monthly organic HAP emitted, kg.

(13) H_a=the monthly allowable organic HAP emissions, kg.

(14) H_L=the monthly average, as-applied, organic HAP content of all solids-containing materials applied at less than 0.04 kg organic HAP per kg of material applied, kg/kg.

(15) H_s=the monthly average, as-applied, organic HAP to solids ratio, kg organic HAP/kg solids applied.

(16) H_{si}=the as-applied, organic HAP to solids ratio of material i.

(17) L=the mass organic HAP emission rate per mass of solids applied, kg/kg.

(18) M_{Bi}=the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in bypass mode and the mass of solids-containing material, i, applied on never-controlled work stations, in a month, kg.

(19) M_{Bj}=the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in bypass mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on never-controlled work stations, in a month, kg.

(20) M_{ci}=the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing material, i, applied on always-controlled work stations, in a month, kg.

(21) M_{cj}=the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on always-controlled work stations in a month, kg.

(23) M_{fi}=the organic volatile matter mass flow rate at the inlet to the control device, kg/h.

(24) M_{fo}=the organic volatile matter mass flow rate at the outlet of the control device, kg/h.

(25) M_{hu}=the mass of organic HAP used in a month, kg.

(26) M_i=the mass of ink or other material, i, applied in a month, kg.

(27) M_{ij}=the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing material, i, in a month, kg.

(28) M_j=the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied in a month, kg.

(29) M_{Lj}=the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, in a month, kg.

(30) M_{vr}=the mass of volatile matter recovered in a month, kg.

(31) M_{vu}=the mass of volatile matter, including water, used in a month, kg.

(33) n=the number of organic compounds in the vent gas.

(34) p=the number of different inks, coatings, varnishes, adhesives, primers, and other materials applied in a month.

(35) q=the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month.

(37) R=the overall organic HAP control efficiency, percent.

(38) R_e=the overall effective organic HAP control efficiency for publication rotogravure, percent.

(39) R_v=the organic volatile matter collection and recovery efficiency, percent.

(40) S=the mass organic HAP emission rate per mass of material applied, kg/kg.

(41) 0.0416=conversion factor for molar volume, kg-mol/m^3 (@ 293 K and 760 mmHg).

[61 FR 27140, May 30, 1996, as amended at 71 FR 29800, May 24, 2006]

§ 63.826 Compliance dates.

(a) The compliance date for an owner or operator of an existing affected source subject to the provisions of this subpart is May 30, 1999.

(b) The compliance date for an owner or operator of a new affected source subject to the provisions of this subpart is immediately upon start-up of the affected source, or May 30, 1996, whichever is later.

(c) Affected sources which have undergone reconstruction are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment are not considered in determining whether the affected source has been reconstructed.

Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs.

§ 63.829 Recordkeeping requirements.

(d) The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

§ 63.830 Reporting requirements.

(a) The reporting provisions of 40 CFR part 63 subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.

(b) Each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:

(1) An initial notification required in §63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in §63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by §63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

§ 63.831 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the requirements in §§63.820 through 63.821 and 63.823 through 63.826.

(2) Approval of alternatives to the test method for organic HAP content determination in §63.827(b) and alternatives to the test method for volatile matter in §63.827(c), and major alternatives to other test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

[68 FR 37354, June 23, 2003]

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(n) One (1) manual parts washer system, PW1, with a maximum capacity of 36.7 gallons per day, using no control, and exhausting to stack SW1. This facility was constructed in 2000.

(The information describing the process contained in this emissions unit 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 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(a) Other activities or categories not previously identified, below insignificant thresholds:

(8) Maintenance shop activities such as welding and grinding and buffing [326 IAC 6-3-2].

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the particulate emissions from maintenance shop activities welding, grinding and buffing shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Catalytic Oxidizer_____
Parameter: Temperature
Limit: Determined by most recently performed acceptable stack test

Month: _____ Year: _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

□ No deviation occurred in this month.

□ Deviation/s occurred in this month.
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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Flexographic Presses P12 and P13
Parameter: VOC input
Limit: VOC input to Presses P12 and P13 shall be limited such that the potential to emit does not exceed 176 tons per year, considering the most recent determination of capture and destruction. Compliance shall be determined at the end of each month based on the previous 12 months. Catalytic oxidizer (OX12 or OX13) shall be in operation at all times when the respective presses (P12 or P13) are in operation. VOC capture and destruction shall be based on the most recent valid stack test.

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

QUARTER : YEAR:

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

□ No deviation occurred in this quarter.

□ 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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Flexographic Press P14
Parameter: VOC input
Limit: VOC input to Press P14 shall be limited such that the potential to emit does not exceed 60 tons per year, considering the most recent determination of capture and destruction. Compliance shall be determined at the end of each month based on the previous 12 months. Catalytic oxidizer (OX14) shall be in operation at all times when the press is in operation. VOC capture and destruction shall be based on the most recent valid stack test.

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

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ 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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Flexographic Press P15
Parameter: VOC input
Limit: VOC input to Press P15 shall be limited such that the potential to emit does not exceed 39 tons per year, considering the most recent determination of capture and destruction. Compliance shall be determined at the end of each month based on the previous 12 months. Catalytic oxidizer (OX15) shall be in operation at all times when the press is in operation. VOC capture and destruction shall be based on the most recent valid stack test.

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

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ 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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Flexographic Press P16
Parameter: VOC input
Limit: VOC input to Press P16 shall be limited such that the potential to emit does not exceed 39 tons per year, considering the most recent determination of capture and destruction. Compliance shall be determined at the end of each month based on the previous 12 months. Catalytic oxidizer (OX16) shall be in operation at all times when the press is in operation. VOC capture and destruction shall be based on the most recent valid stack test.

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

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ 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

Part 70 Quarterly Report

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001
Facility: Flexographic Press P17
Parameter: VOC input
Limit: VOC input to Press P17 shall be limited such that the potential to emit does not exceed 35.4 tons per year, considering the most recent determination of capture and destruction. Compliance shall be determined at the end of each month based on the previous 12 months. Catalytic oxidizer (OX16) shall be in operation at all times when the press is in operation. VOC capture and destruction shall be based on the most recent valid stack test.

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

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ 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
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Printpack Inc.
Source Address: 1505 West Main Street, Greensburg, Indiana 47240
Mailing Address: 4335 Wendell Drive, Atlanta, GA 30336
Part 70 Permit No.: T031-17541-00001

Months: _____ to_____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a Part 70 Operating Permit (TVOP) Renewal

Source Background and Description

Source Name:	**Printpack, Inc.**
Source Location:	**1505 West Main Street, Greensburg, Indiana 47240**
County:	**Decatur**
SIC Code:	**2673 and 3081**
Operation Permit No.:	**T031-17541-00001**
Permit Reviewer:	**ERG/BL**

On July 19, 2007, the Office of Air Quality (OAQ) had a notice published in the Greensburg Daily News, Greensburg, Indiana, stating that Printpack, Inc. had applied for a Part 70 Operating Permit (TVOP) Renewal to operate a stationary printed plastic bag and plastic film production process with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments on the draft permit were submitted by Camilo A. Cruz Senior Environmental Specialist, on behalf of Printpack, Inc. Changes made as a result of these comments are shown throughout this addendum. New language is in **bold** while deleted language is in ~~strikeout~~. The Table of Contents has been updated as necessary.

Printpack, Inc.

On August 9, 2007, Printpack, Inc. submitted comments on the proposed TVOP Renewal. The summary of the comments is as follows:

Comment 1:

The flexographic printing press, identified as P2, and the natural gas/propane fired boiler have been removed from the plant. All references to those emission units should be removed from the TSD and the permit.

Response to Comment 1:

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The following changes have been made to the permit as a result of this comment:

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

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

(a) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1963. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(b) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1965. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.~~

~~(c)~~**(b)** One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1966. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(d)~~**(c)** One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1969. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(e)~~**(d)** One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1967. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(f)~~**(e)** One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1970. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(g)~~**(f)** One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute. This facility was constructed in 1980. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(h)~~**(g)** One (1) four-color flexographic printing press, identified as P12, using a natural gas-fired catalytic oxidizer, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(i)~~**(h)** One (1) four-color flexographic printing press, identified as P13, using a natural gas-fired catalytic oxidizer, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(j)~~**(i)** One (1) six-color flexographic printing press, identified as P14, using a natural gas-fired catalytic oxidizer, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(k)~~**(j)** One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas-fired catalytic oxidizer, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1991. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(l)~~**(k)** One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas-fired catalytic oxidizer, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1995. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(m)~~**(l)** One (1) flexographic printing press, identified as P17, using permanent total enclosure and a natural gas-fired drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute. This facility was constructed in 1999. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(n)~~**(m)** One (1) manual parts washer system, PW1, with a maximum capacity of 36.7 gallons per ray, using no control, and exhausting to stack SW1. This facility was constructed in 2000.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

~~(a) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour, including: One (1) natural gas/propane fired boiler, with a rated capacity of 2.25 million British thermal units per hour (MM Btu/hr) [326 IAC 6-2-3].~~

~~(b)~~**(a)** Other activities or categories not previously identified, below insignificant thresholds:

(8) Maintenance shop activities such as welding and grinding and buffing [326 IAC 6-3-2].

. . .

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

. . .

~~(b) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1965. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.~~

~~(c)~~**(b)** One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1966. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(d)~~**(c)** One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1969. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(e)~~**(d)** One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1967. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(f)~~**(e)** One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1970. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(g)~~**(f)** One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute. This facility was constructed in 1980. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(h)~~**(g)** One (1) four-color flexographic printing press, identified as P12, using a natural gas-fired catalytic oxidizer, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(i)~~**(h)** One (1) four-color flexographic printing press, identified as P13, using a natural gas-fired catalytic oxidizer, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(j)~~**(i)** One (1) six-color flexographic printing press, identified as P14, using a natural gas-fired catalytic oxidizer, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(k)~~**(j)** One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas-fired catalytic oxidizer, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1991. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(l)~~**(k)** One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas-fired catalytic oxidizer, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1995. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

~~(m)~~**(l)** One (1) flexographic printing press, identified as P17, using permanent total enclosure and a natural gas-fired drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute. This facility was constructed in 1999. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

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

. . .

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

~~(a) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour, including: One (1) natural gas/propane fired boiler, with a rated capacity of 2.25 million British thermal units per hour (MM Btu/hr) [326 IAC 6-2-3].~~

~~(b)~~**(a)** Other activities or categories not previously identified, below insignificant thresholds:

(8) Maintenance shop activities such as welding and grinding and buffing [326 IAC 6-3-2].

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

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

~~D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]~~

~~Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 2.25 MMBtu per hour heat input boiler shall be limited to 7.12 pounds per MMBtu heat input.~~

~~This limitation is based on the following equation:~~

~~$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$~~

~~Where Pt = lb PM/MM Btu/hr,~~

~~C = Maximum ground level concentration; 50 micrograms per cubic meter (u/m3)~~
~~Q = total source operating capacity, 2.25 MM Btu/hr~~
~~N = number of stacks, 1~~
~~a = Plume rise factor; 0.8,~~
~~h = stack height; 25 feet~~

~~D.3.2~~**D.3.1** Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the particulate emissions from maintenance shop activities welding, grinding and buffing shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Comment 2:

The capture efficiency testing requirement for the installed controlled presses (P12, P13, P14, P15, P16, and P17) includes a minor typographical error. The condition should read: fundamental change, which may be indicated by operating parameters, and may include any of the following.

Response to Comment 2:

The following changes have been made to the permit as a result of this comment:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Baseline capture efficiency tests have been completed for all of the installed controlled presses (P12, P13, P14, P15, P16, and P17). Capture efficiency tests shall be repeated within one hundred eighty (180) days of a fundamental change, which may be indicated by operating parameters, and may ~~indicate~~ **include** any of the following:

(1) Adding print stations to a press;

(2) Increasing or decreasing the volumetric flow rate from the dryer; or

(3) Changing the static duct pressure.

All testing shall be done in accordance with Section C – Performance Testing.

. . .

Comment 3:

The testing frequency to verify the Permanent Total Enclosure ("PTE") associated with Presses P15 and P17 meet the EPA Method 204 design criteria is not clearly stated.

Response to Comment 3:

The following changes have been made to the permit as a result of this comment:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

. . .

(b) Compliance stack tests shall be performed to determine the minimum operating temperature that will achieve at least a 90% destruction efficiency and to achieve compliance with 326 IAC 8-5-5. The last compliance test for each press oxidizer was January 2004. Every five (5) years stack tests shall be performed.

. . .

(3) The Permittee shall verify the Permanent Total Enclosure ("PTE") associated with Presses P15 and P17 meet the EPA Method 204 design criteria. **The baseline verification shall be performed once. The Permittee shall re-verify the PTE if any modifications are made to the capture system that potentially cause the PTE to fail to meet the EPA Method 204 design criteria.**

Comment 4:

The initial Title V permit No. T031-5950-00001 issued to Printpack, Inc. on December 21, 1998 contained a permit condition B.16. This condition defined the term "exceedance" with several details on what an exceedance does not include. Printpack would like to retain these clarifications in the Renewal No. 031-17541-00001. The extract from Condition B.16 is provided below:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

. . .

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
(2) An emergency as defined in 326 IAC 2-7-1(12); or
(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

Response to Comment 4:

IDEM, OAQ has added a new Condition to Section C that includes a definition of the term "exceedance" (see Condition C.14 Response to Excursions or Exceedances). Subsequent conditions have been renumbered.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimzing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore

normal operation and prevent the likely recurrence of the cause of an excuresion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) intial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

Comment 5:

Condition D.1.7 makes reference to a "Thermal Oxidizer Temperature". Printpack's plant utilizes catalytic oxidizers as control technology. Historical performance testing of the catalytic oxidizers demonstrate the operating temperature is 550 degrees Fahrenheit. Printpack's operating temperature system calculates a 3-hour average.

Response to Comment 5:

The following changes have been made to the permit as a result of this comment:

D.1.7 Thermal Oxidizer Temperature

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer systems (OX12, OX13, OX14, OX15, and OX16) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 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~~ **catalytic** oxidizer**s** at or above the 3-hour average inlet

temperature of ~~1,400~~ **550**°F used to demonstrate compliance with Condition D.1.6, as verified during the most recent compliance test approved by IDEM.

Comment 6:

Printpack stated that Condition D.1.8 refers to duct pressure or fan amperage, as they relate to parametric monitoring. Printpack runs the main fan for the catalytic oxidizers at a set amperage.

Response to Comment 6:

The following changes have been made to the permit as a result of this comment:

D.1.8 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.

(b) The ~~duct pressure or~~ fan amperage shall be observed at least once per day when the oxidizer systems are in operation. On and after the date the approved stack test results are available, ~~the duct pressure or~~ fan amperage shall be maintained ~~within the normal range as~~ **at or above the set-point** established in most recent compliant stack test.

Upon further review, the OAQ has decided to make the following revisions to the permit.

1. Additional recordkeeping is necessary to document compliance with Conditions D.1.7 and D.1.8. The following changes have been made to the permit as a result of this comment:

D.1.9 Record Keeping Requirement

(a) To document compliance with Condition D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with Conditions D.1.1 and D.1.3.

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

(2) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);

(3) The calculated weight of VOCs emitted for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));

(4) The calculated 12 month rolling sum of 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

(7) Parametric monitoring records required under section D.1.6.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the continuous temperature records for the catalytic incinerator. The

Permittee shall include in its records the temperature used to demonstrate compliance during the most recent compliance stack test.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the fan amperage. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of an amperage reading (e.g. the process did not operate that day).

~~(b)~~**(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

2. The One Time Deadlines stated in condition D.1.13 should reference NESHAP instead of NSPS.

D.1.13 One Time Deadlines Relating to ~~NSPS~~ **NESHAP** Subpart KK

The Permittee shall with the following requirements by the dates listed below:

Requirement	Rule Citation	Affected Facility	Deadline
Compliance Dates	40 CFR 63.826 (b)	New & Reconstructed	Immediately after construction.
Submit Initial Notification	40 CFR 63.830(b)	New & Reconstructed	With construction permit application

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	1505 West Main Street, Greensburg, Indiana 47240
County:	Decatur
SIC Code:	2673 and 3081
Operation Permit No.:	T031-5950-00001
Operation Permit Issuance Date:	December 21, 1998
Permit Renewal No.:	T031-17541-00001
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Printpack, Inc. which operates a stationary printed plastic bag and plastic film production process.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1963. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(b) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1965. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(c) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1966. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(d) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1969. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(e) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1967. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(f) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000

feet per minute. This facility was constructed in 1970. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(g) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute. This facility was constructed in 1980. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(h) One (1) four-color flexographic printing press, identified as P12, using a natural gas-fired catalytic oxidizer, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(i) One (1) four-color flexographic printing press, identified as P13, using a natural gas-fired catalytic oxidizer, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(j) One (1) six-color flexographic printing press, identified as P14, using a natural gas-fired catalytic oxidizer, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1985. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(k) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas-fired catalytic oxidizer, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1991. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(l) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas-fired catalytic oxidizer, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute. This facility was constructed in 1995. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(m) One (1) flexographic printing press, identified as P17, using permanent total enclosure and a natural gas-fired drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the existing catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute. This facility was constructed in 1999. Under 40 CFR 63, Subpart KK, this is considered an existing flexographic printing press.

(n) One (1) manual parts washer system, PW1, with a maximum capacity of 36.7 gallons per ray, using no control, and exhausting to stack SW1. This facility was constructed in 2000.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

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

(a) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour, including: One (1) natural gas/propane fired boiler, with a rated capacity of 2.25 million British thermal units per hour (MM Btu/hr) [326 IAC 6-2-3].

(b) Other activities or categories not previously identified, below insignificant thresholds:

(1) Solvent recycling (distillation) unit with batch capacity of 106 gallons. VOC emissions estimated at 5.7 lb/day.

(2) Six (6) 10,000 gallon organic solvent storage tanks. VOC emissions estimated below 1 lb/day.

(3) Fifty-six (56) bag machines used to cut polypropylene into bags.

(4) Eleven (11) polyethylene resin pellet storage silos.

(5) Eleven (11) corona treater units used to apply a corona discharge to plastic film to improve surface properties and having the following maximum capacities:

Unit ID	Kilowatt/hr
Line 21	5kW
Line 22	2.5kW
Line 23	7kW
Line 24	7kW
Line 25	6kW
Line 26	15kW
Line 26	15kW
Line 27	15kW
Line 27	15kW
Line 28	2.5kW
Slitter#5	3.5kW

(6) Vulcanized plate making processes,

(7) Rubber roll grinding, and

(8) Maintenance shop activities such as welding and grinding and buffing [326 IAC 6-3-2].

(c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including catalytic incinerators OX12 - OX16 and drying ovens on P16 and P17.

(d) Combustion source flame safety purging on startup.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6.

(i) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; or 0.3 psi measured at 38^{o}C (100^{o}F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; or 0.1 psi measured at 20oC (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) Forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Heat exchanger cleaning and repair.

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(n) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) 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.

(q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(r) Diesel generators not exceeding 1600 horsepower.

(s) Stationary fire pumps.

(t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^{o}C).

(u) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under the following previous approvals:

(a) T031-5950-00001, issued on December 21, 1998;

(b) SSM 031-10312-00001, issues February 24, 1999;

(c) SSM 031-12005-00001, issued on November 22, 2000;

(d) Reopening 031-13177-00001, issued December 10, 2001;

(e) MSM 031-19138-00001, issued on July 15, 2004; and

(f) MPM 031-19204-00001, issued August, 24, 2004.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

(a) The particulate matter limit for the natural gas/propane fired boiler was incorrectly calculated.

The calculated particulate matter limit presented in T031-5950-00001, Condition D.7.1 was incorrect. Pursuant to the equation in 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the limit should have been 7.12 pounds per MMBtu heat input not 15.95 pounds per MMBtu heat input as stated.

(b) The entire Condition D.1 from T031-5950-00001 has been determined to be no longer necessary. The flexographic printing presses P1-P6 and P9 were constructed in 1963 and have no applicable limitations or standards.

(c) The testing requirements as specified in Conditions D.2.6, D.3.6, D.4.6, and D.5.6 from T031-5950-00001 required that every 2.5 years the catalytic incinerators and thermal oxidizer demonstrate VOC emissions destruction efficiency from the printing presses. Printpack has a second printing facility in Bloomington, Indiana with a five (5) year performance cycle. The source requested their Greensburg renewal permit be modified to allow an identical 5 year testing frequency.

EPA protocol for testing at printing operations specifies a five (5) year destruction efficiency performance cycle. IDEM has modified the testing requirement to match protocol.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 11, 2006. Additional information was received regarding compliance tests for the plant's oxidizers on August 25, 2006.

Emission Calculations

Printpack remains a major stationary source with the potential to emit over two hundred fifty (250) tons per year of VOC. Actual VOC emissions reported for 2003 were 593 tons per year. See Appendix A (pages 1 though 4) of this document for detailed emission calculations of the remaining equipment. VOC emissions calcuations for the printing presses P1 through P6 and P9 are not included in Appendix A because the attached VOC emissions from this source were reported to be greater than 250 tons per year.

The detailed emission calculations do not include HAP calculations. The flexographic facilities are limited to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a

combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Potential to Emit of the Source

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."

The source was issued a Part 70 Operating Permit on December 21, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit *	PM	PM10	SO_2	VOC	CO	NO_X	HAPs
Printing presses P1-P6, P9	-	-	-	a	-	-	Single: less than 10 Combination: less than 25
Printing presses P12 and P13	-	-	-	176 [b]	-	-	
Printing press P14	-	-	-	60.0 [b]	-	-	
Printing press P15	-	-	-	39.0 [c]	-	-	
Printing press P16	-	-	-	39.0 [d]	-	-	
Printing press P17	-	-	-	35.4 [e]	-	-	
Combustion Sources	0.21	0.83	0.07	0.60	9.2	10.9	0.21
Total PTE	0.21	0.83	0.07	593 [f]	9.2	10.9	Single: less than 10 Combination: less than 25

[a] Printing presses P1-P6, and P9 have no VOC emissions limits. Construction of these units commenced in 1963 and predates PSD and Article 8 requirements.

[b] Pursuant to OP16-04-87-0048, issued on February 5, 1986 and 326 IAC 2-2 the annual VOC input to printing presses P12, P13, and P14 shall be limited and catalytic incinerators (OX12 or OX13, OX14) shall be in operation at all times.

[c] Pursuant to CP031-2102-00001, issued on July 31, 1991 the annual VOC input to printing press P15 shall be limited and catalytic incinerator (OX15) shall be in operation at all times.

[d] Pursuant to CP031-3576-00001, issued on September 12, 1994 the annual VOC input to printing press P16 shall be limited and catalytic incinerator (OX16) shall be in operation at all times.

[e] Pursuant to OP031-10312-00001, issued February 24, 1999 and 326 IAC 2-2 the annual VOC input to printing presses P17, P18 and P19 shall be limited and catalytic incinerator (OX16, OX20) shall be in operation at all times. Presses P18 and P19, and catalytic incinerator OX20 were permitted for construction in 1999, but were never installed.

[f] Actual VOC emissions reported for 2003 was 593 tons per year. VOC usage for Presses P12 thorough P17 are limited such that the total potential to emit is 349 tons per year.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of is are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	0
SO_2	0
VOC	593
CO	4
NO_x	5
Lead	0
Total HAP	Not reported

County Attainment Status

The source is located in Decatur County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(a) Decatur County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Decatur County has been designated as attainment or unclassifiable for the 8-hour ozone standard. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Decatur County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, NO_2, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit.

(a) This source does not have a pollutant-specific emissions unit as defined in 40 CFR 64.1:

(1) with the potential to emit before controls equal to or greater than the major source threshold,

(2) that is subject to an emission limitation or standard, and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60.430 – 60.435, Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing) included in this permit. This source is not subject to this rule because all presses are flexographic and not publication rotogravure printing presses.

(c) The NSPS, 326 IAC 12 (40 CFR 60.40c – 60.48c, Subpart Dc – Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units) are not included in this permit. The combustion sources each have a maximum design heat input capacity of less than ten million (10,000,000) Btu per hour.

(d) The NSPS, 326 IAC 12 (40 CFR 60.110b – 60.117b, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) are not included in this permit. The storage tanks each have capacities less than 75 cubic meters (19,813 gallons).

(e) The NESHAP, 326 IAC 20 (40 CFR Part 63.460 – 63.470, Subpart T – National Emission Standards for Halogenated Solvent Cleaning) are not included in this permit for the cold cleaner degreaser. Chlorinated solvents are not used by the cold cleaner degreaser.

(f) The NESHAP, 326 IAC 20 (40 CFR 63.820 – 63.831, Subpart KK – National Emission Standards for the Printing and Publishing Industry) are included in this permit for each

existing flexographic presses (P1, P2, P3, P4, P5, P6, P9, P12, P13, P14, P15, P16, and P17).

The printing presses comply with the requirements in 63.820(a)(2). The flexographic facilities are subject to the following portions of 40 CFR 63, Subpart KK. Non-applicable portions of the NESHAP are not included in the permit.

(1) 63.820(a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7),
(2) 63.822,
(3) 63.826,
(4) 63.829(d),
(5) 63.830(a), (b)(1), and
(6) 63.831.

(g) The NESHAP, 326 IAC 20 (40 CFR 63.3280 – 63.3420, Subpart JJJJ – National Emission Standards: Paper and Other Web Coating) are not included in this permit. The flexographic printing operations do not perform web coating, only printing, and pursuant to 63.3300 are not affected sources. The source does not have any in-line or stand-alone surface coaters.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Presses P1-P6, and P9 were constructed before 1981 and predate PSD and Article 8 requirements. Upon promulgation of the PSD rules, the source was an existing minor source because the uncontrolled potential to emit VOC were less than 250 tons per year.
It is not one of the 28 listed source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD. The potential to emit (PTE) of volatile organic compound (VOC) is greater than two hundred fifty (250) tons per year, which makes this a major source of VOC.

Presses 12, 13, 14, 15, and 16 have VOC limits to keep them under PSD review level:

(a) Pursuant to OP16-04-87-0048, issued on February 5, 1986, the VOC input used on Presses P12 and P13, shall be such that the VOC emissions shall not exceed 176 tons per year after oxidation with a control efficiency of approximately 90%. The potential to emit of this modification was less than the 250 ton per year PSD threshold. Therefore, the requirements of 326 IAC 2-2 did not apply to this modification.

(b) Pursuant to OP16-04-87-0049, issued on February 5, 1986, the VOC input used on Press P14, shall be such that the VOC emissions shall not exceed 60 tons per year. The combined potential to emit of these modifications was less than the 250 ton per year PSD threshold. Therefore, the requirements of 326 IAC 2-2 did not apply to this modification. This source remained a minor source under 326 IAC 2-2.

(c) Pursuant to CP031-2102-00001, issued on July 31, 1991 the VOC input used on Press P15, shall be such that the VOC emissions shall not exceed 39 tons per year. The combined potential to emit of these modifications was greater than the 250 ton per year PSD threshold. At this time the source became a major source under 326 IAC 2-2.

Press 15 shall meet the criteria for permanent total enclosures outlined in 'Best Demonstrated Control for Graphic Arts' EPA-450/3-91-008. Oxidizer destruction efficiency shall be maintained at a minimum of 96%.

(d) Pursuant to CP031-3576-00001, issued on September 12, 1994, the VOC input used on Press P16, shall be such that the VOC emissions shall not exceed 39 tons per year. The combined potential to emit of these modifications was greater than the 250 ton per year PSD threshold. The source remained a major source under 326 IAC 2-2.

Oxidizer (OX16) for VOC control shall be in operation at all times when the press (P16) is in operation. Pursuant to 326 IAC 8-5-5 the minimum oxidation efficiency shall be 90%, and the overall control efficiency shall be 60% minimum.

(e) On December 21, 1998, the source was issued their initial Title V permit T031-5950-00001. This permit included the following VOC input limits for Presses P12 through P19: Compliance with the VOC usage limitations were determined using formulation data supplied by the coating manufacturer.

(1) The VOC input used on Press P14, shall be limited such that VOC emissions shall not exceed 60 tons per twelve (12) consecutive month period. Oxidizer destruction efficiency shall be maintained at a minimum of 90%.

(2) The VOC input used on Press P15, shall be limited such that VOC emissions shall not exceed 39 tons per twelve (12) consecutive month period. Oxidizer destruction efficiency shall be maintained at a minimum of 90%.

(3) The VOC input used on Press P16, shall be limited such that VOC emissions shall not exceed 39 tons per twelve (12) consecutive month period. Oxidizer destruction efficiency shall be maintained at a minimum of 90%.

The source remained a major source under 326 IAC 2-2.

(f) On February 24, 1999, CP 031-10312-00001 was issued for the construction of three (3) eight-color flexographic presses, identified as P17, P18 and P19. Presses P18 and P19 were never installed. Press 17 has VOC controls, which in combination with netted emission reductions kept the potential to emit of these presses below PSD major modification, significant levels. The source remained a major source under 326 IAC 2-2.

The annual VOC input to Press P17 shall be limited such that the potential to emit does not exceed 35.44 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month. Oxidizer destruction efficiency shall be maintained at a minimum of 60%.

(g) On July 15, 2004, MSM 031-19138-00001 was issued for the construction of a photopolymer plate making system (PH01) and a soda blaster to clean parts. The photopolymer plate making system (PH01) shall be limited to less than 25.0 tons per twelve (12) consecutive months. The potential to emit VOC from the plate making system PH01 were below PSD major modification, significant levels. Therefore, the requirements of 326 IAC 2-2 (PSD) were not applicable to this modification. The source remained a major source under 326 IAC 2-2. The photopolymer plate making system (PH01) was never installed.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The flexographic facilities are limited to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee is required to submit annual emission statements because this source has the potential to emit annual VOC emissions greater than 250 tons per year.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Decatur County. There are no facilities located at this source that have the potential to emit greater than 25 tons per year of fugitive particulate matter. This source has not added a facility with the potential to emit fugitive particulate matter greater than 25 tons per year, which requires a permit as set forth in 326 IAC 2, after December 13, 1985. Therefore, pursuant to 326 IAC 6-5-1, this source is not subject to the requirements of 326 IAC 6-5.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to 326 IAC 8-6, because the source existed prior to 1974.

State Rule Applicability – Manual Parts Washer (PW1)

326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

This source is not subject to 326 IAC 8-3-5 (Cold cleaner degreaser operation and control) because the manual parts washer system, PW1, which performs organic solvent degreasing, was constructed before July 1, 1990.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

This source is subject to 326 IAC 8-3-2 (Cold Cleaner Operations) because the manual parts washer system, PW1, performs organic solvent degreasing and was constructed after January 1, 1980. The cold cleaning facility shall be operated in compliance with the following:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability – Flexographic Printing

326 IAC 8-1-6 (New Facilities: General Reduction Requirements (BACT))

The six (6) flexographic printing presses, identified as P12, P13, P14, P15, P16, and P17, are regulated by 326 IAC 8-5-5. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

Presses P1-P6, and P9 were constructed in prior to 1980 and predate Article 8 requirements.

326 IAC 8-2-5

The six (6) flexographic printing presses, identified as P12, P13, P14, P15, P16, and P17, are not subject to 326 IAC 8-2-5. The presses were constructed after the November 1, 1980 applicability date, each has a potential to emit greater than twenty-five (25) tons per year, but they do not perform web coating.

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

The six (6) flexographic printing presses, identified as P12, P13, P14, P15, P16, and P17, are subject to 326 IAC 8-5-5, because the presses were constructed after the November 1, 1980 applicability date and they each have a potential to emit greater than twenty-five (25) tons per year. Pursuant to 326 IAC 8-5-5, the following shall apply:

Presses P12 through P16 comply with this rule by using a carbon adsorption/ incinerator/ alternative VOC reduction system with 90% efficiency.

(a) For P12 and P13 catalytic incineration is required under OP16-04-87-0048, issued on February 5, 1986.

(b) For P14 catalytic incineration is required under OP16-04-87-0049, issued on February 5, 1986.

(c) For P15 catalytic incineration is required under CP031-2102, 00001, issued on July 31, 1991.

(d) For P16 catalytic incineration required under CP031-3576, 00001, issued on September 12, 1994.

P17 complies with this rule by exhausting through a catalytic incinerator capable of achieving 95% destruction efficiency. For P17 a catalytic incineration is required under CP031-10312-00001, issued February 24, 1999. Compliance with this rule may be determined pursuant to 326 IAC 8-1-4 (Testing procedures). P1-P6 and P9 were constructed prior to the applicability of this rule.

State Rule Applicability – Insignificant Combustion

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emission rate for the natural gas/propane fired boiler, constructed in 1973, shall be limited to 7.12 pounds of PM per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}.$$

Where Pt = lb PM/MM Btu,

C = Maximum ground level concentration; 50 micrograms per cubic meter (ug/m3)
Q = total source operating capacity, 2.25 MM Btu/hr
N = number of stacks, 1
a = Plume rise factor; 0.8,
h = stack height; 25 feet

326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion sources, oxidizers and drying ovens, are not subject to this rule because they are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) are not applicable.

326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the particulate emissions from maintenance shop activities welding, grinding and buffing shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Testing Requirements

Destruction efficiency testing is required for the catalytic incinerators and thermal oxidizer controlling VOC emissions from printing presses every five (5) years. In 2004, destruction efficiency testing was performed for Presses P12, P13, P14, P15, P16, and P17. Each thermal oxidizer achieved destruction efficiency greater than 93 percent.

Baseline capture efficiency tests have been completed for all of the installed controlled presses (P12, P13, P14, P15, P16, and P17). The Permittee shall repeat capture efficiency tests within one hundred eighty (180) days of a fundamental change (e.g., adding print stations to a press).

The Permittee shall verify Permanent Total Enclosures associated with Presses P15 and P17 meet the EPA Method 204 design criteria as part of the periodic test program.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

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

1. The presses P12 and P13 have applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer systems, OX12 and OX13, for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 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 3-hour average temperature of 1,400°F.

   (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits, as approved by IDEM.

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

2. The press P14 has applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer system, OX14, for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 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 3-hour average temperature of 1,400°F.

   (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits, as approved by IDEM.

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

3. The press P15 has applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer system, OX15, for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 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 3-hour average temperature of 1,400°F.

   (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits, as approved by IDEM.

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

4. The presses P16 and P17 have applicable compliance monitoring conditions as specified below:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizer system, OX16, for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 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 3-hour average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits, as approved by IDEM.

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

Compliance with the above requirements will ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 (Preventive Significant Deterioration) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this printed plastic bag and plastic film production plant shall be subject to the conditions of this Part 70 permit 031-17541-00001.

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

Company Name: Printpack Inc.
Address City IN Zip: 1505 West Main Street, Greensburg, IN 47240
Title V Renewal: 031-17541-00001
Reviewer: ERG/BL
Date: July 31, 2006

Flexographic Printing Press	Natural Gas Fired Capture System	Capture System Heat Input Capacity (MMBtu/hr)	Maximum Output (ft/min)
P12	OX12	1.20	1,252
P13	OX13	1.20	1,536
P14	OX14	1.20	1,000
P15	OX15	2.84	1,000
P16	OX16	8.00	1,000
P17	OX16	-	1,200

One (1) natural gas/propane fired boiler, with a rated capacity of 2.25 million British thermal units per hour (MM Btu/hr).

Total:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.7	143

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.60	100	5.5	84.0
Potential to Emit in tons/yr	0.14	0.54	0.04	7.2	0.39	6.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

Methodology
All emission factors are based on normal firing.
Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF)/2,000lb/ton

Appendix A: Emissions Calculations
HAP Emissions from Natural Gas Combustion
MM BTU/HR <100
Small Industrial Boiler

Company Name: Printpack Inc.
Address City IN Zip: 1505 West Main Street, Greensburg, IN 47240
CP: 031-17541-00001
Reviewer: ERG/BL
Date: July 31, 2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	1.50E-04	8.60E-05	5.37E-03	1.29E-01	2.44E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	3.58E-05	7.88E-05	1.00E-04	2.72E-05	1.50E-04

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
VOC Emissions from Flexographic Printing Press P12 through P19

Company Name: Printpack Inc.
Address City IN Zip: 1505 West Main Street, Greensburg, IN 47240
Title V Renewal: 031-17541-00001
Reviewer: ERG/BL
Date: July 31, 2006

Flexographic Printing Press	Natural Gas Fired Capture System	Control Efficiency	Maximum Output (ft/min)	PTE VOC from Ink (tons/yr)	PTE VOC from Cleaning Solvent (tons/yr)	Total PTE VOC (tons/yr)	Controlled VOC Emissions (tons/yr)	VOC Emission Limit (tons/yr)
P12	OX12	97.4%	1,252	718	25.6	743	19.3	176
P13	OX13	97.6%	1,536	880	25.6	906	21.7	
P14	OX14	97.3%	1,000	573	25.6	599	16.2	60
P15	OX15	98.7%	1,000	573	25.6	599	7.78	39
P16	OX16	93.6%	1,000	573	25.6	599	38.3	39
P17	OX16	93.6%	1,200	688	25.6	713	45.6	35
					Total	**4,158**	**149**	**349**

Given:
Worst case ink usage based on 250% coverage
Worst ink is 1.22 lbs VOC/lb solids
Maximum hours of operation accounting for inherent down time is 6,570 hrs/yr
20 gallons per day of cleaning solvents used for each press (7 lbs VOC/gal)

Potential ink VOC emissions from each press:
Example calcaution, press P12:
1,252 ft/min * 60 min/hr * 5.2 ft wide print area * 1 ream/3,000 sq ft = 130 reams/hr
130 reams/hr * 0.55 lb solids/ream * 1.22 lbs VOC/lb solids * Ink Usage 250% = 218 lbs VOC/hr
218 lbs VOC/hr * 6,570 hrs runtime/yr * 1 ton/2,000 lbs = 718 tons/yr

Potential cleaning solvent VOC emissions from each press:
20 gal/day * 365 days/yr * 7 lbs/gal * 1 ton/2,000 lbs = 25.6 tons/yr

Controlled VOC Emissions:
Compliance test for the plant's catalytic incinerators (identified as OX12, OX13, OX14, OX15, and OX16) were performed in January 2004, IDEM staff was present.
Presses P18, P19, and oxidizer OX20 have not been installed yet.
Pursuant to 031-10694-00001, issued March 9, 1999 presses P18 & P19 are controlled by regenerative thermal oxidizer OX20 with an overall control efficiency of 97%.
[326 IAC 8-5-5(e)(3) requires flexographic printing processes capture system shall attain an overall control efficiency of 60% or greater]

Example calcaution, press P12:
(718 ton/yr + 25.5 ton/yr) * (1 - 97.4%) = 19.3 tons/yr

Appendix A: Emissions Calculations
Parts Washer (W1)
VOC Emissions

Company Name: Printpack Inc.
Address City IN Zip: 1505 West Main Street, Greensburg, IN 47240
Title V Renewal: 031-17541-00001
Reviewer: ERG/BL
Date: July 31, 2006

Solvent	Density (lbs/gal)	Weight % VOC	Max. Throughput Rate (gals/day)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Reclaimed Solvent*	6.86	100%	12.0	82.3	15.0

* The solvent used in this system does not contain any regulated HAPs.
MSDS specifies reclaimed solvent composition as 18-22% n-propyl acetate and 78-82% normal propanol

Methodology
PTE VOC (lbs/day) = Max. Throughput Rate (gals/day) * Density (lbs/gal) * Weight % VOC
PTE VOC (tons/yr) = PTE of VOC (lbs/day) * 365 (days/yr) * 1 ton/2,000 lbs = 15 tons/yr.