



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 5, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Bomarko, Inc. / MSOP 099-17838-00021

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 9/16/03



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Bomarko, Inc.
1955 North Oak Road
Plymouth, Indiana 46563

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 099-17838-00021	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 5, 2004 Expiration Date: May 5, 2009

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
A.3	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]	
B.5	Modification to Permit [326 IAC 2]	
B.6	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.7	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.8	Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.9	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.10	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
B.11	Annual Fee Payment [326 IAC 2-1.1-7]	
C	SOURCE OPERATION CONDITIONS.....	10
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
C.6	Performance Testing [326 IAC 3-6]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	Compliance Monitoring [326 IAC 2-1.1-11]	
C.9	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.10	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements	
C.11	Malfunctions Report [326 IAC 1-6-2]	
C.12	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.13	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1	EMISSIONS UNIT OPERATION CONDITIONS – Printing Presses.....	15
	Emission Limitations and Standards	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]	
D.1.2	Preventive Maintenance Plan [326 IAC 1-6-3]	
	Compliance Determination Requirements	
D.1.3	Volatile Organic Compounds (VOC)	
	Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]	
D.1.4	Record Keeping Requirements	
D.2	EMISSIONS UNIT OPERATION CONDITIONS - Insignificant Activities.....	17

Boilers

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-2-3][326 IAC 6-2-4]

Compliance Determination Requirements

D.2.2 Natural Gas

Degreasing operations

Emission Limitations and Standards

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Annual Notification	19
Malfunction Report	20

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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a waxed and coated paper and foil roll and sheeted stock manufacturing operation.

Authorized Individual: Geza J. Verik, President
Source Address: 1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address: P.O. Box 1510, Plymouth, Indiana 46563
General Source Phone: (574) 936-9901
SIC Code: 2671
County Location: Marshall
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), constructed in 1970, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (b) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), constructed in 1975, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (c) one (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (d) one (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (e) one (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (f) one (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (g) one (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (h) one (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
- (i) one (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;

- (j) one (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;
- (k) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
 - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
 - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
 - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
 - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
 - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983;
 - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
 - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
 - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
 - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996.
- (l) Combustion source flame safety purging on startup.
- (m) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) one (1) Safety Kleen cold parts cleaner. [326 IAC 8-3-2]
- (o) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (p) Closed loop heating and cooling systems.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (s) 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. [326 IAC 6-3-2]
- (t) Paved and unpaved roads and parking lots with public access.
- (u) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (v) 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.
- (w) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (x) On-site fire and emergency response training approved by the department.
- (y) Gasoline emergency generators not exceeding 110 horsepower.
- (z) Other emergency equipment such as stationary fire pumps.
- (aa) Purge double block and bleed valves.
- (bb) Filter or coalescer media changeout.
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (dd) The following activities not previously identified with emissions equal to or less than the insignificant thresholds:
 - (1) One (1) foil baler in Plant 1;
 - (2) One (1) paper baler in Plant 1, which exhausts to two (2) small baghouses which vent indoors;

- (3) One (1) baler in Plant 2;
- (4) Rewinders;
- (5) Waxers;
- (6) One (1) 4,000 gallon ethyl acetate underground storage tank;
- (7) One (1) 4,000 gallon N-propyl acetate underground storage tank;
- (8) One (1) 4,000 gallon Isopropyl alcohol underground storage tank;
- (9) One (1) ink mix room (emissions are accounted for under printing operations);
- (10) One (1) printing press (Press No. 11) in Plant 2; and
- (11) One (1) six inch printing press (Press No. 12) in Plant 1.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

B.7 Preventive Maintenance Plan [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) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2][IC 13-30-3-1]**

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 permitted 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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, at reasonable times, 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM (**and local agency**), the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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 an "authorized individual" 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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 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.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), constructed in 1970, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (b) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), constructed in 1975, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (c) one (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (d) one (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (e) one (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (f) one (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (g) one (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (h) one (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
- (i) one (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (j) one (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of Presses 1-2-P3, 1-2-P4, 1-2-P5, 1-2-P7, 1-2-P8, 1-2-P9, BFP15, and BFP16 employing solvent-containing ink unless, for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements [326 IAC 8-1-10]

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below for each press pursuant to 326 IAC 8-1-10. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.
 - (1) The name and identification number of each coating, as applied.
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in pound of VOC per pound of solids in the coating.
 - (3) As new compliant coatings are added to a coating facility, the records shall be updated to include the new coating.
 - (4) If use of a coating is discontinued, the records required by 326 IAC 8-1-10 shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
- (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
 - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
 - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
 - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
 - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
 - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983;
 - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
 - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
 - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
 - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
- (1) one (1) Safety Kleen cold parts cleaner.

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

Boilers

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-2-3][326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3(e), (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate matter emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per million British thermal units (MMBtu) heat input. Therefore, the PM emissions from the 2.14 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu per hour, the pounds of particulate matter emitted per MMBtu heat input shall not exceed 0.6. Therefore, particulate matter emissions from the 1.5 MMBtu per hour boiler shall not exceed 0.6 pounds per MMBtu heat input.

Compliance Determination Requirements

D.2.2 Natural Gas

In order to demonstrate compliance with D.2.1, the source shall burn only natural gas.

Degreasing operations

Emission Limitations and Standards (Cold Cleaning Degreaser Operations)

D.2.3 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Bomarko, Inc.
Address:	1955 North Oak Road
City:	Plymouth, Indiana 46563
Phone #:	(574) 936-9901
MSOP #:	099-17838-00021

I hereby certify that Bomarko, Inc. is still in operation.
 no longer in operation.

I hereby certify that Bomarko, Inc. is in compliance with the requirements of MSOP **099-17838-00021**
 not in compliance with the requirements of MSOP **099-17838-00021**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Bomarko, Inc. PHONE NO. (574) 936-9901
LOCATION: (CITY AND COUNTY) Plymouth, Marshall County
PERMIT NO. MSOP 099-17838 AFS PLANT ID: 099-00021 AFS POINT ID: _____ INSP: Rick Reynolds
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Bomarko, Inc.
Source Location:	1955 North Oak Road, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	2671
Operation Permit No.:	MSOP 099-17838-00021
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed an application from Bomarko, Inc. relating to the operation of the waxed and coated paper and foil roll and sheeted stock manufacturing operation.

This source was issued Part 70 Permit No. T099-7713-00021 on March 11, 1999. Since that time, the source has totally eliminated the use of solvent-based inks and is now using water-based inks exclusively on all presses. As a result, HAP emissions from the inks have been eliminated and VOC emissions have been greatly reduced so that potential VOC emissions are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-6.1, the source is subject to the Minor Source Operating Permit (MSOP) requirements and no longer subject to the Part 70 permit requirements.

Permitted Emission Units and Pollution Control Equipment

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

- (a) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), constructed in 1970, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (b) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), constructed in 1975, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (c) one (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (d) one (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (e) one (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (f) one (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (g) one (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (h) one (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);

- (i) one (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (j) one (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;
- (k) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
 - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
 - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
 - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
 - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
 - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983;
 - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
 - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
 - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
 - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996.
- (l) Combustion source flame safety purging on startup.
- (m) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) one (1) Safety Kleen cold parts cleaner.
- (o) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (p) Closed loop heating and cooling systems.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (s) 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.
- (t) Paved and unpaved roads and parking lots with public access.
- (u) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (v) 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.
- (w) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (x) On-site fire and emergency response training approved by the department.
- (y) Gasoline emergency generators not exceeding 110 horsepower.
- (z) Other emergency equipment such as stationary fire pumps.
- (aa) Purge double block and bleed valves.
- (bb) Filter or coalescer media changeout.
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (dd) The following activities not previously identified with emissions equal to or less than the insignificant thresholds (less than 5 lbs/hr or 25 lbs/day):
 - (1) One (1) foil baler in Plant 1;

- (2) One (1) paper baler in Plant 1, which exhausts to two (2) small baghouses which vent indoors;
- (3) One (1) baler in Plant 2;
- (4) Rewinders;
- (5) Waxers;
- (6) One (1) 4,000 gallon ethyl acetate underground storage tank;
- (7) One (1) 4,000 gallon N-propyl acetate underground storage tank;
- (8) One (1) 4,000 gallon Isopropyl alcohol underground storage tank;
- (9) One (1) ink mix room (emissions are accounted for under printing operations);
- (10) One (1) printing press (Press No. 11) in Plant 2; and
- (11) One (1) six inch printing press (Press No. 12) in Plant 1.

Unpermitted Emission Units and Pollution Control Equipment

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

Permitted Emission Units Removed from the Source

The following emission unit and its associated control device was decommissioned and removed from the source:

- (a) one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 Permit No. T099-7713-00021, issued on March 11, 1999;
- (b) First Minor Permit Modification No. 099-13815-00021, issued on March 8, 2001;
- (c) First Reopening to a Part 70 Operating Permit No. R099-13407-00021, issued on November 6, 2001;
- (d) First Administrative Amendment No. 099-14912-00021, issued on October 30, 2001; and
- (e) Second Administrative Amendment No. 099-15491-00021, issued on February 7, 2002.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Part 70 Permit No. T099-7713-00021, issued on March 11, 1999

Conditions D.1.1(a) through (c) and (e) and Condition D.1.1(g) (later re-numbered as D.1.1(f) in AA No. 099-14912-00021, issued on October 20, 2001):

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (c) the owner or operator installs and operates:

- (1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
 - (2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
 - (3) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (e) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:
- (1) seventy-five percent (75%) for publication rotogravure processes;
 - (2) sixty-five percent (65%) for packaging rotogravure processes; and
 - (3) sixty percent (60%) for flexographic printing processes.
- (f) To ensure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, the input of VOC to the nine (9) presses and the usage of cleanup solvent for the nine (9) presses [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 239.65 tons used per 12 consecutive months period. This limitation will prevent the VOC emissions from the entire source being greater than 249 tons per year.

Reasons not incorporated:

The requirements in paragraphs (a) through (c) and (e) of condition D.1.1 were removed because the source will comply with the emission limit of 0.5 pound of VOC per pound of solids in the ink. Therefore, the requirements in paragraphs (a) through (c) and (e) do not need to be included in the permit.

Since the Part 70 permit was issued, the source has totally eliminated the use of solvent-based inks and is now using water-based inks exclusively on all presses. As a result, VOC emissions have been greatly reduced so that potential VOC emissions are less than 100 tons per year. Therefore, the VOC usage limit in paragraph (f) of condition D.1.1 is no longer required.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
1-2-P1-1	Press 1-2-P1	33.0	1.0	1270	194
1-2-P2-1	Press 1-2-P2	33.0	1.0	2339	158
1-2-P3-1	Press 1-2-P3	32.5	1.0	3844	165
1-2-P3-2	Press 1-2-P3	32.5	1.0	3844	165
1-2-P4-1	Press 1-2-P4	32.5	1.0	6839	142
1-2-P4-2	Press 1-2-P4	32.5	1.0	6839	142
1-2-P4-3	Press 1-2-P4	32.5	1.0	6839	142
1-2-P5-1	Press 1-2-P5	33.0	1.0	3216	181
1-2-P7-1	Press 1-2-P7	31.5	1.0	3100	160
1-2-P7-2	Press 1-2-P7	31.5	1.0	3100	160
1-2-P8-1	Press 1-2-P8	33.0	1.0	3000	180
1-2-P9-1	Press 1-2-P9	33.0	1.0	3200	200
1-1-I-1	Boiler	34.0	1.0	2000	250

Recommendation

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

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

A complete application for the purposes of this review was received on August 14, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations (3 pages).

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	0.29
PM-10	1.14
SO ₂	0.09
VOC	54.25
CO	12.63
NO _x	15.04

HAPs	Potential to Emit (tons/yr)
Hexane	Less than 10
Total	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) 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 applicability.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Marshall County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	Less than 250
PM-10	Less than 250
SO ₂	Less than 250
VOC	Less than 250
CO	Less than 250
NO _x	Less than 250
Single HAP	N/A
Combination HAPs	N/A

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Part 70 permit issued to this source on March 11, 1999. Potential emissions of all pollutants from this source are now less than 100 tons per year making the requirements of 326 IAC 2-7 (Part 70) no longer applicable.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 099-17838-00021, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on the information submitted with the MSOP application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because the printing presses at this source are not publication rotogravure printing presses.
- (c) The boilers at this source are not subject to the requirements of 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, because they are all rated at less than 10 MMBtu per hour.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.
- (e) The printing presses at this source are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.820 through 63.831, Subpart KK, National Emission Standards for the Printing and Publishing Industry), because this source is not now, nor has ever been a major source of HAPs. This source has not previously used and currently does not use any inks that contain HAPs. Therefore, this source is not now, nor was previously subject to this rule.
- (f) The printing presses at this source are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.4280 through 63.4371, Subpart OOOO, National Emission Standards for Printing, Coating, and Dyeing of Fabrics and Other Textiles), because this source does not coat fabrics or other textiles and is not now, nor has ever been a major source of HAPs. Therefore, this source is not now, nor was previously subject to this rule.
- (g) The Safety Kleen cold parts cleaner, which is an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T) because it does not use a halogenated HAP solvent as a cleaning agent.

State Rule Applicability – Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all regulated pollutants is less than 250 tons per year and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

Previously, the source had accepted a VOC usage limit for all printing presses in Part 70 Permit No. T099-7713-00021, issued on March 11, 1999, to limit VOC emissions to less than 250 tons per year so that the requirements of 326 IAC 2-2 did not apply. Since the Part 70 permit was issued, the source has totally eliminated the use of solvent-based inks and is now using water-based inks exclusively on all presses. As a result, VOC emissions have been greatly reduced so that potential VOC emissions are less than 100 tons per year. Therefore the VOC usage limit is no longer required.

326 IAC 2-6 (Emission Reporting)

This source is located in Marshall County and the potential to emit of all pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions 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.

State Rule Applicability – Individual Facilities

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

This source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

- (a) The requirements of 326 IAC 6-2-3 apply to indirect heating facilities constructed prior to September 21, 1983. Pursuant to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), particulate matter emissions from the 2.14 MMBtu per hour boiler, constructed before September 21, 1983, shall be limited by the following equation:

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

where: Pt = Pounds of PM emitted per MMBtu heat input.

C = 50 ug/m³ (maximum ground level conc.)

a = plume rise factor = 0.67

h = 34 ft.

Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.

= 2.14 MMBtu/hr

N = Number of stacks in fuel burning operation.

For the 2.14 MMBtu per hour boiler, Pt is calculated as follows:

$$Pt = \frac{50 \times 0.67 \times 34.0}{76.5 \times 2.14^{0.75} \times 1^{0.25}} = 8.4 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(e), particulate matter emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per MMBtu heat input. Therefore, since this is the most stringent limit, particulate matter emissions from the 2.14 MMBtu per hour boiler shall not exceed 0.6 pound per MMBtu heat input. Potential PM emissions from this facility is less than 0.6 pound per MMBtu heat input, therefore, this facility will comply with 326 IAC 6-2-3.

The 0.164 MMBtu per hour hot water boiler, the two (2) 0.66 MMBtu per hour hot water boilers, and the 2.58 MMBtu per hour hot water boiler, constructed prior to September 23, 1983, are not subject to this rule because hot water boilers are not indirect heating facilities.

- (b) The requirements of 326 IAC 6-2-4 apply to indirect heating facilities constructed after September 1, 1983. Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), particulate matter emissions from the 1.5 MMBtu per hour boiler, constructed after September 1, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.

Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.

Q = 2.14 MMBtu/hr (from existing boiler) + 1.5 MMBtu/hr + 3.0 MMBtu/hr from paper and natural gas-fired boiler (which has since been removed)

Q = 6.64 MMBtu per hour. (when the 1.5 MMBtu/hr boiler was installed in 1996, the 3.0 MMBtu/hr paper and natural gas-fired boiler had not yet been retired, therefore the 3.0 MMBtu/hr boiler is included in the calculation of Q.)

$$Pt = \frac{1.09}{(6.64)^{0.26}} = 0.67 \text{ pound per MMBtu heat input.}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu per hour, Pt shall not exceed 0.6. Therefore, particulate matter emissions from the 1.5 MMBtu per hour boiler shall not exceed 0.6 pounds per MMBtu heat input. Potential particulate matter emissions from the 1.5 MMBtu per hour boiler are less than 0.6 pounds per MMBtu, therefore, this boiler will comply with 326 IAC 6-2-4.

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

The printing presses at this source are not subject to the requirements of this rule because they do not have particulate emissions.

The trimmer has a process weight rate less than 100 pounds per hour, therefore, pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate is 0.551 pound per hour.

None of the other particulate emitting facilities has potential particulate emissions of greater than 0.551 pound per hour, therefore, pursuant to 326 IAC 6-3-1(b)(14), they are not subject to this rule.

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

This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions of 25 tons per year or more, which are not otherwise regulated by other provisions of Article 8.

None of the printing presses at this source are subject to the requirements of this rule. The four (4) presses identified as 1-2-P1, 1-2-P2, 1-2-P3, and 1-2-P4 were all constructed prior to 1980, therefore, they are not subject to this rule. The remaining presses, identified as 1-2-P5, 1-2-P7, 1-2-P8, 1-2-P9, BFP15, and BFP16 are not subject to this rule because they are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

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

Since this source is located in Marshall County, this rule applies to sources or facilities constructed after November 1, 1980 pursuant to 326 IAC 8-5-1. The two (2) presses identified as 1-2-P1 and 1-2-P2 are not subject to this rule because they were constructed prior to November 1, 1980. Presses 1-2-P3 and 1-2-P4 were also constructed prior to November 1, 1980 but are subject to 326 IAC 8-5-5 per Agreed Order Cause No. A-1580 which requires these units operate in compliance with the rule. The remaining presses are subject to the rule because they were each constructed after November 1, 1980.

Pursuant to 326 IAC 8-5-5, no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (c) the owner or operator installs and operates:
 - (1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
 - (2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
 - (3) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.
- (e) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:
 - (1) seventy-five percent (75%) for publication rotogravure processes;
 - (2) sixty-five percent (65%) for packaging rotogravure processes; and
 - (3) sixty percent (60%) for flexographic printing processes.

The coatings used in Presses 1-2-P3 through 1-2-P5, 1-2-P7 through 1-2-P9, and in Presses BFP15 and BFP16, which are all water-based coatings, comply with the emission limit of 0.5 pound of VOC per pound of solids in the ink (see Appendix A, page 1 of 3 for compliance calculations), therefore, the source will use this emission limit to comply with 326 IAC 8-5-5.

326 IAC 8-1-10 (Compliance Certification, Record keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings)

This rule applies to sources that use compliant coatings to comply with VOC emission limits and meet the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Since this source uses compliant coatings to comply with the VOC emission limit pursuant to 326 IAC 8-5-5, the source shall comply with the certification, record keeping, and reporting requirements of this rule.

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

This rule applies to sources that use control devices to comply with VOC emission limits and meet the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Since this source has removed Press 1-2-P6 and its associated catalytic incinerator, as permitted under First Administrative Amendment No. 099-14912-00021, issued on October 30, 2001, the requirements of this rule no longer apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The Safety Kleen cold parts cleaner is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because it was constructed after January 1, 1980 and prior to July 1, 1990. Pursuant to this rule, the owner or operator 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.

The Safety Kleen cold parts cleaner is not subject to the requirements of 326 IAC 8-3-5 because it was constructed prior to July 1, 1990.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source commenced operation prior to 1974, therefore, this rule does not apply.

No other 326 IAC Article 8 rules apply.

Conclusion

The operation of this waxed and coated paper and foil roll and sheeted stock manufacturing plant shall be subject to the conditions of the **Minor Source Operating Permit 099-17838-00021**.

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

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: 099-17838
Pit ID: 099-00021
Reviewer: Trish Earls
Date: 14-Aug-03

State Potential Emissions (uncontrolled):

Throughput for Presses:										
Press I.D.		Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	Min/Hour	Hours/Year	1/1,000,000	MMin ² /Year		
1-2-P1		600	12	50.0	60	8760	1,000,000	189,216		
1-2-P2		600	12	50.0	60	8760	1,000,000	189,216		
1-2-P3		800	12	45.0	60	8760	1,000,000	227,059		
1-2-P4		600	12	45.0	60	8760	1,000,000	170,294		
1-2-P5		1,200	12	44.0	60	8760	1,000,000	333,020		
1-2-P7		800	12	50.0	60	8760	1,000,000	252,288		
1-2-P8		800	12	45.0	60	8760	1,000,000	227,059		
1-2-P9		800	12	50.0	60	8760	1,000,000	252,288		
BFP15		1,250	12	60.0	60	8760	1,000,000	473,040		
BFP16		1,000	12	60.0	60	8760	1,000,000	378,432		

INK VOCS:

Ink Name	Ink Density (lb/gal)	Maximum Coverage lbs/MMin ²	Weight % Organics	Flash Off %	Through Put MMin ² /Year	Tons/2,000 lbs	VOC Pounds per Hour	VOC Tons per Year	Weight % Solids	Lb VOC/Lb Solids
Press 1-2-P1										
0528 WB roto letdown	8.58	0.889	4.20%	100.00%	189,216	2,000	0.81	3.53	46.50%	0.09
Press 1-2-P2										
0528 WB roto letdown	8.58	0.833	4.20%	100.00%	189,216	2,000	0.76	3.31	46.50%	0.09
Press 1-2-P3										
0528 WB roto letdown	8.58	1.074	4.20%	100.00%	227,059	2,000	1.17	5.12	46.50%	0.09
Press 1-2-P4										
0528 WB roto letdown	8.58	1.384	4.20%	100.00%	170,294	2,000	1.13	4.95	46.50%	0.09
Press 1-2-P5										
0528 WB roto letdown	8.58	1.459	4.20%	100.00%	333,020	2,000	2.33	10.20	46.50%	0.09
Press 1-2-P7										
0528 WB roto letdown	8.58	0.283	4.20%	100.00%	252,288	2,000	0.34	1.50	46.50%	0.09
Press 1-2-P8										
0528 WB roto letdown	8.58	1.501	4.20%	100.00%	227,059	2,000	1.63	7.16	46.50%	0.09
Press 1-2-P9										
0528 WB roto letdown	8.58	0.283	4.20%	100.00%	252,288	2,000	0.34	1.50	46.50%	0.09
Press BFP15										
0528 WB roto letdown	8.58	0.765	4.20%	100.00%	473,040	2,000	1.74	7.60	46.50%	0.09
Press BFP16										
0528 WB roto letdown	8.58	1.076	4.20%	100.00%	378,432	2,000	1.95	8.55	46.50%	0.09
Total State Potential Emissions:							12.20	53.42		

Note:

None of the above inks contain hazardous air pollutants (HAPs).
 All of the above inks, are in compliance with the limit pursuant to 326 IAC 8-5-5 of 0.5 lbs of VOC per lb of solids.

Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
 Pound VOC per pound Solid = (Density (lb/gal) * Weight percentage organics) / (Density (lb/gal) * Weight % Solids)

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

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: 099-17838
Pit ID: 099-00021
Reviewer: Trish Earls
Date: 14-Aug-03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

34.3

300.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.29	1.14	0.09	15.04	0.83	12.63

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 3 for HAPs emissions calculations.

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

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: 099-17838
Pit ID: 099-00021
Reviewer: Trish Earls
Date: 14-Aug-03

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.159E-04	1.805E-04	1.128E-02	2.707E-01	5.114E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.520E-05	1.655E-04	2.106E-04	5.716E-05	3.159E-04

Methodology is the same as page 2.

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