



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 30, 2005
RE: Graphic Packaging Corporation / 113-17841-00022
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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 1/10/05



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

**Graphic Packaging Corporation
 301 South Progress Drive East
 Kendallville, Indiana 46755**

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

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

Operation Permit No.: F113-14980-00022	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 23, 2003 Expiration Date: May 23, 2008
First Minor Permit Revision: F113-17841-00022	Pages Revised: 21-24, 29031
Issued by: Origin signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 30, 2005 Expiration Date: May 23, 2008



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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary paperboard folding carton operation.

Authorized Individual:	Plant Manager
Source Address:	301 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address:	301 South Progress Drive East, Kendallville, Indiana 46755
General Source Phone:	(260) 347-7612
SIC Code:	2657
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

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

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

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (1) One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.
- (f) One (1) 1000 gallon fountain solution tote;
- (g) One (1) 880 gallon adhesive tote;
- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM10 emissions less than five pounds per hour.

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

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

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

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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

B.3 Permit Term [326 IAC 2-8-4(2)] [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, modifications, or amendments of this permit do not affect the expiration date.

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

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

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

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

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

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

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (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 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may be required to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 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 the "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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

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

Telephone No.: 1-800-219-753-5519 (Northern Regional Office)
Facsimile No.: 219-245-4877

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, 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 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) **Right to Operate After Application for Renewal** [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ 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 needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][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 FESOP 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 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, at reasonable times, 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, 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the 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 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 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 be accredited is not federally enforceable.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements 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 2-8-4] [326 IAC 2-8-5(a)(1)]

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [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 source must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

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

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

D.1.1 Hazardous Air Pollutants (HAPs)[326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited as follows:

- (a) The HAP content delivered to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited such that any single HAP emitted is less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit facility-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. Each HAP emitted will be based on the following equation:

$$\text{Single HAP emissions (tpy)} = \sum (\text{HAP containing material}_i \text{ usage} \times \text{HAP content} \times \text{percent emission factor for material}_i)$$

- (b) The HAP content delivered to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited such that any combination of HAPs emitted is less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit facility-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. Each HAP emitted will be based on the following equation:

$$\text{Total HAP emissions (tpy)} = \sum (\text{Single HAP emissions as calculated in D.1.1(a)})$$

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to each of the four (4) lithographic printing presses and associated clean up activities shall be limited such that the VOC emitted is less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \sum (\text{VOC containing material}_i \text{ usage} \times \text{VOC content} \times \text{percent emission factor for material}_i)$$

Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

The VOC content delivered to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited such that VOC emitted will not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC Emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \sum (\text{VOC containing material}_i \text{ usage} \times \text{VOC content} \times \text{percent emission factor for material}_i)$$

This limit shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.4 Percent Emission Factors

As derived from the "Preferred and Alternate Methods for Estimating Air Emissions from the Printing, Packaging, and Graphic Arts Industry"; Volume II; Chapter 15, May 2002, (see page 15.4-3) the following HAP and VOC emission factors shall be used in HAP and VOC emissions formulas in D.1.1, D.1.2, and D.1.3.

Material	% Emission Factor
<u>Ink</u>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<u>Coatings</u>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the four (4) in-line flexographic coating units shall not discharge into the atmosphere more than 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water, delivered to the applicator at each of the four (4) in-line flexographic coating units.

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

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

D.1.7 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) Associated with Clean Up Activities

The VOC flash off for clean-up solvent is 100%. As derived from "USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994.), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in HAPs and VOCs emissions formula in D.1.1, D.1.2, and D.1.3 as an emission control technique and shall meet the following conditions:

- a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celcius (20°C); and
- b) The clean-up solvents shall be kept in covered tanks or covered containers during transport and storage; and

- c) The cleaning cloths used with the clean-up solvents shall be placed in closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC)

Compliance with the VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data or MSDS supplied by the manufacturer.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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 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.1.10 VOC and HAP Emissions

Compliance with Condition D.1.1 for HAP emissions, and Conditions D.1.2, D.1.3 and D.1.4 for VOC emissions shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, single HAP and combined HAP usage for the most recent twelve (12) month period.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
- (1) The VOC content of each ink, varnish, coating material and solvent used;
 - (2) The amount of ink, varnish, coating material and solvent used less water on a monthly basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS), or manufacturer formulation data necessary to verify the type and amount used. For inks the MSDS with highest VOC content may be used to determine compliance.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;

Records shall include purchase orders, invoices and material safety data sheets (MSDS) , or manufacturer formulation data to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
 - (4) The weight of VOCs and HAPs emitted for each compliance period.
 - (5) When any non-compliant coating is used on any in-line flexographic coating unit, the

volume weighted average VOC content of all the coatings, both compliant and noncompliant, used on that unit shall be used to determine compliance with the limitation for that day for that unit; and

- (6) A log of the dates of use of non-compliant coatings.
- (b) To document compliance with Condition D.1.7, 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.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.

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

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

D.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 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.

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

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

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

This form consists of 2 pages

Page 1 of 2

9 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 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
 FESOP No.: 113-14980-00022
 Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.
 Parameter: VOC
 Limit: The VOC emissions from the four (4) printing presses, including the in-line flexographic coating units and the associated clean up activities shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022
Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004.
Parameter: VOC
Limit: The VOC emissions from each of the four (4) lithographic printing presses and associated clean up activities shall be limited to 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
 FESOP No.: 113-14980-00022
 Facility: four (4) printing presses and associated clean up activities
 Parameter: Single HAP and Total HAPs

Limit: Emissions of HAPs shall be limited as follows:

- (a) The emissions of any single HAP from the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The emissions of any combination of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 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**

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

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description:

Source Name: Graphic Packaging Corporation
Source Location: 301 South Progress Drive East, Kendallville, Indiana
 46755
County: Noble
SIC Code: 2657
Revision Permit No.: F113-17841-00022
FESOP No.: F113-14980-00022
Date Issued: May 23, 2003
Permit Reviewer: Cynthia Bymaster

History

Graphics Packaging Corporation was issued a Federally Enforceable State Operating Permit (FESOP) on May 23, 2003. Graphics Packaging Corporation petitioned for an Administrative Review and Request for Stay of Effectiveness of the FESOP operating permit on June 16, 2003. This petition was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-3095. This minor permit modification shows the changes made to the FESOP operating permit in order to settle issues raised by the two petitions for review.

The appeal requests or most recent language change request follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing **highlighted** in the responses. In addition to any changes made to address appealed provisions, the Table of Contents and page numberings have been changed as needed.

Appeal Item 1:

The Permittee objects to condition D.1.1. The Permittee believes the FESOP contains certain recordkeeping requirements that are inconsistent with the permit limits and seeks IDEM's revision of the FESOP to reflect recordkeeping requirements that are consistent with the limits. The Permittee has offered proposed language.

Response 1:

IDEM, OAQ has agreed to most of the Permittee's requested change. D.1.1(b) does not incorporate the requested compliance determination "30 days following the end of each calendar month". It will remain "compliance determined at the end of each month".

D.1.1 Hazardous Air Pollutants (HAPs)[326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses, **including in-line flexographic coating units**, and **the** associated clean up activities shall be limited as follows:

- (a) The ~~input of any single HAP~~ **content delivered** to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities ~~to~~ shall be limited **such that any single HAP emitted is less than** 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit **facility-wide** single HAP

emissions to less than ten (10) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used. Each HAP emitted will be based on the following equation:

$$\text{Single HAP emissions (tpy)} = \sum (\text{HAP containing material; usage} \times \text{HAP content} \times \text{percent emission factor for material;})$$

- (b) The input of any combination of HAPs content delivered to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities to shall be limited such that any combination of HAPs emitted is less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit facility-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used. Each HAP emitted will be based on the following equation:

$$\text{Total HAP emissions (tpy)} = \sum (\text{Single HAP emissions as calculated in D.1.1(a)})$$

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

Appeal Item 2:

The Permittee objects to condition D.1.2 and D.1.3 because it bases the limits on usage not emissions. The Permittee proposes a flash off percentage of 100%, based upon recent US EPA documentation. The Permittee proposes specific language for these conditions.

Response 2:

IDEM agrees with the Permittee and most of the proposed language. The addition of the new D.1.4 and D.1.7 changes the numbering of the subsequent conditions. A revised Table of Contents has been included with the Permit modification.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The input of VOC content delivered to each of the four (4) lithographic printing presses and associated clean up activities shall be limited such that the VOC emitted is less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \sum (\text{VOC containing material; usage} \times \text{VOC content} \times \text{percent emission factor for material;})$$

Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

The input of VOC content delivered to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited such that VOC emitted will not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used. VOC Emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \sum (\text{VOC containing material; usage} \times \text{VOC content} \times \text{percent emission factor for material;})$$

This limit shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.4 Percent Emission Factors

As derived from the "Preferred and Alternate Methods for Estimating Air Emissions from the Printing, Packaging, and Graphic Arts Industry"; Volume II; Chapter 15, May 2002, (see page 15.4-3) the following HAP and VOC emission factors shall be used in HAP and VOC emissions formulas in D.1.1, D.1.2, and D.1.3.

Material	% Emission Factor
Ink	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
Coatings	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

Due to additional conditions, Condition D.1.4 is now Condition D.1.5; Condition D.1.5 is now Condition D.1.6. IDEM, OAQ has added Condition D.1.7.

D.1.7 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) Associated with Clean Up Activities

The VOC flash off for clean-up solvent is 100%. As derived from "USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994.), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formula in D.1.2 as an emission control technique and shall meet the following conditions:

- a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celcius (20°C); and
- b) The clean-up solvents shall be kept in covered tanks or covered containers during transport and storage; and
- c) The cleaning cloths used with the clean-up solvents shall be placed in closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

Appeal Item 3:

The Permittee offers specific language to include management practices in the permit as suggested in the US EPA documentation previously mentioned.

Response 3:

IDEM agrees with the Permittee and the proposed language. The addition of the new D.1.9 changes the numbering of the subsequent conditions. A revised Table of Contents has been included with this permit modification. The affected Quarterly reports have been modified to reflect emissions rather than usage.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and emissions limitations contained in Conditions D.1.1 and

D.1.2 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 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.

Appeal Item 4:

The Permittee offers specific language to modify the recordkeeping requirements to sustain the flash off factors and management practices requirements.

Response 4:

IDEM agrees that the record keeping must reflect the revision from usage to emissions. The proposed language was used, in part, for the revisions to this condition.

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

D.1.811 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (56) below. Records maintained for (1) through (56) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
- (1) The VOC content of each ink, varnish, coating material and solvent used;
- (2) The amount of ink, varnish, coating material and solvent used less water on a ~~daily~~ monthly basis;
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS), or manufacturer formulation data necessary to verify the type and amount used. For inks the MSDS with highest VOC content may be used to determine compliance.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (A) Records shall include purchase orders, invoices and material safety data sheets (MSDS), or manufacturer formulation data to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
- (B) ~~Certified vendor analysis of the amount of solvent recovered per month.~~
- (4) ~~The total VOC and HAP usage for each month;~~
- (54) The weight of VOCs and HAPs emitted for each compliance period.
- (65) When any non-compliant coating is used on any in-line flexographic coating unit, the volume weighted average VOC content of all the coatings, both compliant and noncompliant, used on that unit shall be used to determine compliance with the limitation for that day for that unit; and
- (76) A log of the dates of use of non-compliant coatings.
- (b) To document compliance with Condition D.1.56, 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.

D.1.912 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
 FESOP No.: 113-14980-00022
 Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.
 Parameter: VOC
 Limit: The input of VOC emissions from the four (4) printing presses, including the in-line flexographic coating units and the associated clean up activities shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.~~

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage Emission This Month	VOC Usage Emission Previous 11 Months	VOC Usage Emission 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**

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
 FESOP No.: 113-14980-00022
 Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004.
 Parameter: VOC
 Limit: The input of VOC emissions from each of the four (4) lithographic printing presses and associated clean up activities shall be limited to 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

YEAR:

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
 FESOP No.: 113-14980-00022
 Facility: four (4) printing presses and associated clean up activities
 Parameter: Single HAP and Total HAPs

Limit: Emissions of HAPs shall be limited as follows:

- (a) The ~~input~~ **emissions** of any single HAP ~~to~~ **from** the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. ~~For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.~~
- (b) The ~~input~~ **emissions** of any combination of HAPs ~~to~~ **from** the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. ~~For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.~~

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 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.