



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 14, 2008

RE: Avery Dennison PFD / 089-18134-00062

FROM: Matthew Stuckey, Branch 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, 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 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Avery Dennison PFD
650 West 67th Avenue
Scherverville, Indiana 46375-1390**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17

Operation Permit No.: 089-18134-00062	
Issued by/Original Signed By: Matthew Stuckey, Branch Chief Permits Branch Office of Air Quality	Issuance Date: July 14, 2008 Expiration Date: July 14, 2013

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS.....	8
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2][326 IAC 2-3]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS.....	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Opacity [326 IAC 5-1]	
C.2	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.5	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.6	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	
C.7	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
C.8	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
	Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]	
C.9	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	

- C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2] [326 IAC 2-3]
- C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2] [326 IAC 2-3]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS..... 26

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

- D.1.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]
- D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

Compliance Determination Requirements

- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
- D.1.4 VOC Control [326 IAC 8-1-2(a)] [326 IAC 8-5-5]
- D.1.5 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-9] [326 IAC 8-1-12]

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

- D.1.6 Thermal Oxidizer Operation and Parametric Monitoring Requirements

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

- D.1.7 Record Keeping Requirements [326 IAC 8-1-12]
- D.1.8 Reporting Requirements [326 IAC 8-1-12]

D.2 FACILITY OPERATION CONDITIONS..... 31

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

- D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 VOC Control
- D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

- D.2.5 Record Keeping Requirements
- D.2.6 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS..... 33

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

- D.3.1 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS..... 34

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

- D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

D.5 FACILITY OPERATION CONDITIONS..... 35

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

E.1 FACILITY OPERATION CONDITIONS 37

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: The Printing and Publishing Industry [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP Subpart KK (National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing [326 IAC 20-1] [40 CFR Part 63, Subpart A])

E.1.2 NESHAP Subpart KK Requirements [40 CFR 63, Subpart KK]

E.1.3 One Time Deadlines Relating to NESHAP Subpart KK

E.2 FACILITY OPERATION CONDITIONS 39

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Organic Liquids Distribution (Non-Gasoline) [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to NESHAP Subpart EEEE (National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline) [326 IAC 20-1] [40 CFR Part 63, Subpart A])

E.2.2 NESHAP Subpart EEEE Requirements [40 CFR 63, Subpart EEEE]

Certification Form 40

Emergency/Deviation Occurrence Report 41

Quarterly Report Form 43-46

Quarterly Compliance Monitoring Report Form 47

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary commercial rotogravure printing and pigment and lacquer manufacturing operation.

Source Address:	650 West 67 th Avenue, Schererville, Indiana 46375-1390
Mailing Address:	650 West 67 th Avenue, Schererville, Indiana 46375-1390
General Source Phone Number:	(219)322-5030
SIC Code:	2754, 2816
County Location:	Lake
Source Location Status:	Moderate Nonattainment for 8-hour Ozone Standard Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source under Emission Offset Rules Major Source Section 112 of the Clean Air Act Minor Source under PSD

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

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

- (a) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks C-7A and C-7B respectively. Under 40 CFR 63, Subpart KK, these are considered as three (3) existing packaging rotogravure printing presses.
- (b) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (c) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, with emissions controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (d) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, with emissions controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.
- (e) One (1) lacquer production area, consisting of the following equipment:
 - (1) Two (2) Schold mixers, installed in 1974, identified as 700 and 701, each with maximum capacity of thirty (30) horsepower.

- (2) One (1) KD mill, installed in 1974 and identified as 702, with a maximum capacity of 75 horsepower.
 - (3) One (1) KD mill, installed in 1993 and replaced in 2002, identified as 703, with a maximum capacity of 75 horsepower.
 - (4) One (1) Schold mixer, installed in 1979 and replaced in 1993, identified as 709, with maximum capacity of fifteen (15) horsepower.
 - (5) One (1) ER mixer, installed in 1993, identified as 710, with a maximum capacity of ten (10) horsepower.
 - (6) One (1) Schold mixer, installed in 1993, identified as 711, with a maximum capacity of thirty (30) horsepower.
 - (7) Two (2) Schold mixers, installed in 1979 and replaced in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower.
 - (8) One (1) sandmill, installed in 1993, identified as 802.
 - (9) Two (2) Schold mixers, installed in 1993, each with maximum capacity of thirty (30) horsepower.
 - (10) One (1) GM Mixer.
- (f) One (1) pigment production area, consisting of the following equipment:
- (1) One (1) Hockmeyer mixer, identified as PP-2, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (3) One (1) stripper tub, one (1) homogenizer tub, one (1) spent acetone tank, one (1) product tank, and two (2) sludge tanks.
- (g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr consisting of one (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 MMBtu/hr [326 IAC 6-2-4]
- (b) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of

HAPs, including:

- (7) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons [326 IAC 8-9].
- (8) Degreasing operations not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(c) Paved roads and parking lots. [326 IAC 6-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 089-18134-00062, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15th of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

- (a) If required by specific conditions in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:
- (1) Identification of the official title and position of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest 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 Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Northwest Regional Office: Telephone Number: (219) 757-0265
Facsimile Number: (219) 757-0267

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

-
- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to 089-18134-00062 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5][326 IAC 2-2-2][326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITION

Entire Source

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

C.1 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 twenty percent (20%) 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.2 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. The requirements of 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.5 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.8 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.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-51 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each

deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management

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

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

Stratospheric Ozone Protection

C.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 2-7-5(15)]:

- (a) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks C-7A and C-7B respectively. Under 40 CFR 63, Subpart KK, these are considered as three (3) existing packaging rotogravure printing presses.
- (b) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (c) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, with emissions controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (d) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, with emissions controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/ hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.

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

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

D.1.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]

- (a) Pursuant to Significant Source Modification 089-11272-00062, issued on April 25, 2000, the Permittee shall comply with the following:
 - (1) The input of VOC to press C-9, including cleanup solvent, shall be limited to 1,266 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (2) The minimum overall VOC control efficiency for the thermal oxidizers for press C-9 shall be 98.5%.

Compliance with the above limits shall render the requirements of 326 IAC 2-3 (Emission Offset) not applicable to the modifications performed in 2001 under SSM 089-11272-00062.
- (b) Pursuant to Significant Source Modification 089-23352-00062, issued on February 27, 2007, and as revised in T089-18134-00062, the Permittee shall comply with the following:
 - (1) The input of VOC to press C-11, including cleanup solvent, shall be limited to 2,194 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (2) The minimum overall VOC control efficiency for the thermal oxidizers for press C-11 shall be 98.6%.
- (c) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications performed in 1985, the Permittee shall comply with the following:

- (1) The total input of VOC to presses C-8 and C-10, including cleanup solvent, shall be limited to 779 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The minimum overall VOC control efficiency for the thermal oxidizers for presses C-8 and C-10 shall be 95.0%.

Compliance with the above limits shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications performed in 1985.

D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 8-5-5, the Permittee shall:

- (a) Not cause, allow, or permit the operation of the presses (C-7, C-8, C-9, C-10, C-11, and Texmac) unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) Use a capture system in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

Compliance Determination Requirements

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units C-7, C-8, C-9, C-10, C-11, and Texmac and their control devices.

D.1.4 VOC Control [326 IAC 8-1-2(a)] [326 IAC 8-5-5]

Pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-5-5, and in order to achieve compliance with Conditions D.1.1 and D.1.2:

- (a) The Permittee shall operate the thermal oxidizer controlling emissions from press C-9 at all times the coater is wetted and VOC materials are being applied.
- (b) The Permittee shall operate the thermal oxidizer controlling emissions from press C-11 at all times the coater is wetted and VOC materials are being applied.
- (c) The Permittee shall operate the thermal oxidizing incinerator controlling emissions from the two (2) rotogravure printing presses identified as C-7 and C-10 and the one (1) pilot packaging rotogravure printing press, identified as Texmac, at all times that any of coaters are is wetted and VOC materials are being applied.
- (d) The Permittee shall operate the thermal oxidizer controlling emissions from press C-8 at all times the coater is wetted and VOC materials are being applied.

D.1.5 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-9] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-9:

- (1) For the purpose of records required under 326 IAC 8-1-12(c), the applicable test methods and procedures specified in 326 IAC 8-1-4 of this rule shall be used to determine the following:

- (A) The volatile organic compound (VOC) content of each coating, as applied.
 - (B) The efficiency of each capture system and control device.
- (2) Records required by this rule or records used to demonstrate that a source is exempt from the requirements of this article shall be submitted to the IDEM, OAQ within thirty (30) days of the receipt of a written request.
- (3) All records required by this rule or records necessary to determine compliance with 326 IAC 8-5-5 shall be accessible on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (b) Pursuant to 326 IAC 8-1-12, for facilities using control devices to comply with 326 IAC 8-5-5, the Permittee shall comply with the following requirements:
- (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.
 - (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and IDEM, OAQ inspectors.
 - (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (AA) startup of a new coating facility;
 - (BB) changing the method of compliance for an existing coating facility from compliant coatings or daily weighted averaging to control devices; or
 - (CC) receipt of a written request from the IDEM, OAQ.
 - (D) All compliance tests shall be conducted according to a protocol approved by the IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (i) Test procedures.
 - (ii) Operating and control system parameters.
 - (iii) Type of VOC containing process material being used.
 - (iv) The process and control system parameters that will be monitored during the test.
 - (2) Monitoring equipment requirements shall be as follows. If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an

accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

- (c) Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day and maintain all of the following information each day for each coating facility:
- (1) The name and identification number of each coating used at each coating facility.
 - (2) The weight of VOC of each coating used each day at each coating facility.
 - (3) The required overall emission reduction efficiency for each day for each coating facility.
 - (4) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by 326 IAC 8-1-12(b)(1)(C).
 - (5) Control device monitoring data for thermal incinerators as follows:
 - (A) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.
 - (B) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (6) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
- (d) Pursuant to 326 IAC 8-1-12, the Permittee shall collect, record, and maintain for each coating facility a maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

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

D.1.6 Thermal Oxidizer Operation and Parametric Monitoring Requirements

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For the purposes of measuring temperature, continuous shall mean no less often than once per fifteen (15) minutes.
- (b) The specified temperature value for each thermal oxidizer is the three (3) hour average temperature during the most recent control device performance test that demonstrates compliance with the limits in Condition D.1.1 as approved by IDEM, at which the destruction efficiency was determined. If a condition exists which would result in response steps, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances or whenever a three (3) hour average temperature is more than 28 degrees C (50 degrees F) below 1,400 degrees F. A three (3) hour average temperature that is more than 28 degrees C (50 degrees F) below 1,400 degrees F is not considered a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances shall be considered a deviation from this permit.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate steps in accordance with Section C - Response to Excursion or

Exceedances whenever a three (3) hour average temperature is more than 28 degrees C (50 degrees F) below the three (3) hour average temperature observed during the compliance stack test. A three (3) hour average temperature that remains more than 28 degrees C (50 degrees F) below the observed temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), (b), and (c), the Permittee shall maintain the following records for the presses identified as C-8, C-9, C-10, and C-11 in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits and thermal oxidizer temperature requirements established in Conditions D.1.1(a), (b), and (c),
- (1) The amount and VOC content of each ink, coating material, wash, and cleanup solvent used on a monthly basis for presses C-8, C-9, C-10, and C-11. Records shall include purchase orders, invoices, supplier data sheets, material safety data sheets (MSDS), and lacquer and pigment product formulation data necessary to verify the type and amount used.
 - (2) The total VOC usage for each month for presses C-8, C-9, C-10, and C-11.
 - (3) The continuous thermal oxidizer temperature for presses C-8, C-9, C-10, and C-11.
 - (4) The weight of VOCs emitted for each compliance period for presses C-8, C-9, C-10, and C-11.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

- (a) Pursuant to 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ when any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
- (1) Name and location of the coating facility.
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (3) Time, date, and duration of the noncompliance.
 - (4) Corrective action taken.
- (b) A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(c) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) One (1) lacquer production area, consisting of the following equipment:
- (1) Two (2) Schold mixers, installed in 1974, identified as 700 and 701, each with maximum capacity of thirty (30) horsepower.
 - (2) One (1) KD mill, installed in 1974 and identified as 702, with a maximum capacity of 75 horsepower.
 - (3) One (1) KD mill, installed in 1993 and replaced in 2002, identified as 703, with a maximum capacity of 75 horsepower.
 - (4) One (1) Schold mixer, installed in 1979 and replaced in 1993, identified as 709, with maximum capacity of fifteen (15) horsepower.
 - (5) One (1) ER mixer, installed in 1993, identified as 710, with a maximum capacity of ten (10) horsepower.
 - (6) One (1) Schold mixer, installed in 1993, identified as 711, with a maximum capacity of thirty (30) horsepower.
 - (7) Two (2) Schold mixers, installed in 1979 and replaced in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower.
 - (8) One (1) sandmill, installed in 1993, identified as 802.
 - (9) Two (2) Schold mixers, installed in 1993, each with maximum capacity of thirty (30) horsepower.
 - (10) One (1) GM Mixer.
- (e) One (1) pigment production area, consisting of the following equipment:
- (1) One (1) Hockmeyer mixer, identified as PP-2, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (3) One (1) stripper tub, one (1) homogenizer tub, one (1) spent acetone tank, one (1) product tank, and two (2) sludge tanks.

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

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] and Emission Offset Minor Limit [326 IAC 2-3]
Pursuant to CP 089-3522-00062, issued August 11, 1995 and as revised in T089-18134-00062:

- (a) The pigment produced by the pigment stripper shall be limited to 360 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Emissions from the pigment stripper shall be limited to less than 0.0694 tons of VOC per ton of pigment produced.

- (b) The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emissions from lacquer production shall be limited to less than 0.64 pounds of VOC per ton of lacquer produced.

Compliance with these limits renders the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (General Reduction Requirements) not applicable to the modifications completed pursuant to CP 089-3522-00062, issued August 11, 1995, and SSM 089-23352-00062, issued February 27, 2007.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Myers Mixer (PP-1) and its control devices.

Compliance Determination Requirements

D.2.3 VOC Control

In order to comply with Condition D.2.1, The two (2) condensers shall operate at all times that the Myers mixer is operated. The condensers shall be operated and maintained according to the manufacturers specifications.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the materials throughput and VOC emissions limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by maintaining records of usage and maintaining product formulation data for all coatings manufactured in the pigment production and lacquer production facilities. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain monthly records of the amount of pigment produced by the pigment stripper. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the materials throughput limit established in Condition D.2.1(a).
- (b) To document compliance with Condition D.2.1(b), the Permittee shall maintain monthly records of the amount of lacquer ingredients mixed in the lacquer production mixers. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the materials throughput limit established in Condition D.2.1(b).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

Insignificant Activity:

- (b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:
- (7) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons [326 IAC 8-9].

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

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

D.3.1 Record Keeping Requirements

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), Permittee of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to IDEM, OAQ a report containing the following information on the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr consisting of one (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 MMBtu/hr. [326 IAC 6-2-4]

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 5.25 million British thermal unit per hour natural gas fired boiler constructed in 1986, shall be limited to 0.6 pounds per million British thermal unit heat input.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Insignificant Activity

(b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:

(8) Degreasing operations not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations, 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.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks C-7A and C-7B respectively. Under 40 CFR 63, Subpart KK, these are considered as three (3) existing packaging rotogravure printing presses.
- (b) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (g) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, which has a maximum line speed of 1,500 feet per minute (ft/min), and a maximum printing width of 71 inches controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (h) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, which has a maximum line speed of 300 ft/min, and a maximum printing width of 39 inches. Emissions will be controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: The Printing and Publishing Industry [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP Subpart KK (National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry [326 IAC 20-1] [40 CFR Part 63, Subpart A])

- (a) Pursuant to 40 CFR 63.823, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 as specified in Table 1 of 40 CFR Part 63, Subpart KK in accordance with schedule in 40 CFR 63 Subpart KK.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 NESHAP Subpart KK Requirements [40 CFR 63, Subpart KK]

Pursuant to 40 CFR 63, Subpart KK, the Permittee which engages in printing and publishing shall comply with the following provisions of 40 CFR Part 63, Subpart KK, (included as Attachment A of this permit) with a compliance date of May 30, 1999:

- (A) 40 CFR 63.820 Applicability.

- (B) 40 CFR 63.821 Designation of affected sources.
- (C) 40 CFR 63.823 Standards: General.
- (D) 40 CFR 63.825 Standards: Product and packaging rotogravure.
- (E) 40 CFR 63.826 Compliance dates.
- (F) 40 CFR 63.827 Performance test methods.
- (G) 40 CFR 63.828 Monitoring requirements.
- (H) 40 CFR 63.829 Recordkeeping requirements.
- (I) 40 CFR 63, Subpart KK, Table 1

E.1.3 One Time Deadlines Relating to NESHAP Subpart KK

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

Requirement	Rule Cite	Affected Facility	Deadline
Compliance Dates	40 CFR 63.826 (b)	New & Reconstructed	Immediately after construction.
Submit Initial Notification	40 CFR 63.830(b)	New & Reconstructed	With construction permit application
Submit Notification of Intent to Conduct a Performance Test	40 CFR 63.7(b) and 63.9(e)	Printing Presses	60 days before scheduled test.
Results of Initial Performance Tests	40 CFR 63.830(b)(4)	Printing Presses	Within 60 days of the test.
Notification of Compliance Status	40 CFR 63.830(b)	Entire Source	As provided in the relevant sections.
Start-up, shut down & malfunction Report.	40 CFR 63.830(b)(5)(i)	Printing Presses	Within 30 days following each calendar half year.
Immediate Start-up, shut down & malfunction Report.	40 CFR 63.830(b)(5)(ii)	Printing Presses	Within 2 working days following the action taken.
Semiannual Summary Report	40 CFR 63.830(a)(1)	Printing Presses	Within 30 days following each calendar half year.

SECTION E.2 FACILITY OPERATION CONDITIONS

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

- (g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Organic Liquids Distribution (Non-Gasoline) [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to NESHAP Subpart EEEE (National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline) [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.823, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 as specified in Table 12 of 40 CFR Part 63, Subpart EEEE in accordance with schedule in 40 CFR 63 Subpart EEEE.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 NESHAP Subpart EEEE Requirements [40 CFR 63, Subpart EEEE]

Pursuant to 40 CFR 63, Subpart EEEE, the fifteen (15) volatile organic liquid storage tanks and the associated loading equipment shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE, (included as Attachment B of this permit):

- (A) 40 CFR 63.2334(a)
(B) 40 CFR 63.2338(a), (b), (c)(1 - (3), (f)
(C) 40 CFR 63.2342(b)(1), (d)
(D) 40 CFR 63.2343(a), (d)
(E) 40 CFR 63.2382(a), (b)(1)
(F) 40 CFR 63.2386(a), (c)(1 - (3), (d)(3)(i), (d)(93)(ii), (d)(4)(i)
(G) 40 CFR 63.2390(a), (d)
(H) 40 CFR 63.2394(a), (b), (c)
(I) 40 CFR 63.2398
(J) 40 CFR 63.2402
(K) 40 CFR 63.2006

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No. Renewal: T089-18134-00062

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)

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-18134-00062

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Avery Dennison MFD
 Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
 Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
 Part 70 Permit No.: T089-18134-00062
 Facility: pigment production and lacquer production
 Parameter: Volatile Organic Compound (VOC)
 Limit: The pigment produced by the pigment stripper shall be limited to 96.5 tons per 12 month period, rolled on a monthly basis. The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period for each facility.

YEAR:

Month	Pigment Usage this month (tons)	Pigment Usage past 11 months (tons)	Pigment Usage past 12 months (tons)	Lacquer Usage this month (tons)	Lacquer Usage past 11 months (tons)	Lacquer Usage past 12 months (tons)

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Avery Dennison PFD
 Source Address: 650 West 67th Avenue, Schererville, Indiana
 Mailing Address: 650 West 67th Avenue, Schererville, Indiana
 Part 70 Permit No.: 089-18134-00062
 Facility: Press C-9
 Parameter: Input of VOC
 Limit: Less than 1,266 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

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

Part 70 Quarterly Report

Source Name: Avery Dennison PFD
 Source Address: 650 West 67th Avenue, Schererville, Indiana
 Mailing Address: 650 West 67th Avenue, Schererville, Indiana
 Part 70 Permit No.: 089-18134-00062
 Facility: Press C-8 and C-10
 Parameter: Total input of VOC
 Limit: Less than 779 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

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

Part 70 Quarterly Report

Source Name: Avery Dennison PFD
 Source Address: 650 West 67th Avenue, Schererville, Indiana
 Mailing Address: 650 West 67th Avenue, Schererville, Indiana
 Part 70 Permit No.: 089-18134-00062
 Facility: Press C-11
 Parameter: Input of VOC
 Limit: Less than 2,194 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

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

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Avery Dennison PFD
 Source Address: 650 West 67th Avenue, Schererville, Indiana
 Mailing Address: 650 West 67th Avenue, Schererville, Indiana
 Part 70 Permit No.: 089-18134-00062

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A, NESHAP Subpart KK

**Avery Dennison PFD
650 West 67th Avenue
Scherverville, Indiana 46375**

Permit No.: 089-18134-00062

National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry

§ 63.820 Applicability.

(a) The provisions of this subpart apply to:

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

§ 63.821 Designation of affected sources.

(a) The affected sources subject to this subpart are:

(2) All of the product and packaging rotogravure or wide-web flexographic printing presses at a facility plus any other equipment at that facility which the owner or operator chooses to include in accordance with paragraphs (a)(3) or (a)(4) of this section, except

(i) Proof presses, unless the owner or operator chooses to include proof presses in the affected source in accordance with paragraph (a)(5) of this section.

(ii) Any product and packaging rotogravure or wide-web flexographic press which is used primarily for coating, laminating, or other operations which the owner or operator chooses to exclude, provided that

(A) the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure print stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds 5 percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations; and

(B) The owner or operator maintains records as required in §63.829(f).

(3) The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source stand-alone equipment subject to the following provisions:

(i) Stand-alone equipment meeting any of the criteria specified in this subparagraph is eligible for inclusion:

(A) The stand-alone equipment and one or more product and packaging rotogravure or wide-web flexographic presses are used to apply solids-containing materials to the same web or substrate; or

(B) The stand-alone equipment and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material; or

(C) A common control device is used to control organic HAP emissions from the stand-alone equipment and from one or more product and packaging rotogravure or wide-web flexographic printing presses;

(ii) All eligible stand-alone equipment located at the facility is included in the affected source; and

(iii) No product and packaging rotogravure or wide-web flexographic presses are excluded from the affected source under the provisions of paragraph (a)(2)(ii) of this section.

(4) The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source narrow-web flexographic presses subject to the following provisions:

(i) Each narrow-web flexographic press meeting any of the criteria specified in this subparagraph is eligible for inclusion:

(A) The narrow-web flexographic press and one or more product and packaging rotogravure or wide-web flexographic presses are used to apply solids containing material to the same web or substrate; or

(B) The narrow-web flexographic press and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material; or

(C) A common control device is used to control organic HAP emissions from the narrow-web flexographic press and from one or more product and packaging rotogravure or wide-web flexographic presses; and

(ii) All eligible narrow-web flexographic presses located at the facility are included in the affected source.

(5) The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source rotogravure proof presses or flexographic proof presses subject to the following provisions:

(i) Each proof press meeting any of the criteria specified in this subparagraph is eligible for inclusion.

(A) The proof press and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material; or

(B) A common control device is used to control organic HAP emissions from the proof press and from one or more product and packaging rotogravure or wide-web flexographic presses; and

(ii) All eligible proof presses located at the facility are included in the affected source.

(6) Affiliated operations such as mixing or dissolving of ink or coating ingredients prior to application; ink or coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of ink or coating lines and line parts; handling and storage of inks, coatings, and solvents; and conveyance and treatment of wastewater are part of the printing and publishing industry source category, but are not part of the product and packaging rotogravure or wide-web flexographic printing affected source.

(b) Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR 63.2, that complies with the criteria of paragraphs (b)(1) or (b)(2) on and after the applicable compliance date as specified in §63.826 of this subpart is subject only to the requirements of §63.829(e) and §63.830(b)(1) of this subpart.

(1) The owner or operator of the affected source applies no more than 500 kilograms (kg) per month, for every month, of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials on product and packaging rotogravure or wide-web flexographic printing presses, or

(2) The owner or operator of the affected source applies no more than 400 kg per month, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.

(c) Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR 63.2, that complies with neither the criterion of paragraph (b)(1) nor (b)(2) of this section in any month after the applicable compliance date as specified in §63.826 of this subpart is, starting with that month, subject to all relevant requirements of this subpart and is no longer eligible to use the provisions of paragraph (b) of this section, even if in subsequent months the affected source does comply with the criteria of paragraphs (b)(1) or (b)(2) of this section.

§ 63.822 Definitions.

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

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

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

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

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

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

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

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

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

Day means a 24-consecutive-hour period.

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

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

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

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

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

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

- (1) The product of the capture efficiency and the control device efficiency or
- (2) A liquid-liquid material balance.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(6) [Reserved]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(22) [Reserved]

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

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

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

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

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

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

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

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

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

(32) [Reserved]

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

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

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

(36) [Reserved]

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

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

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

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

(41) 0.0416=conversion factor for molar volume, kg-mol/m³ (@ 293 K and 760 mmHg).

§ 63.823 Standards: General.

Table 1 to this subpart provides cross references to the 40 CFR Part 63, subpart A, general provisions, indicating the applicability of the general provisions requirements to this subpart KK.

§ 63.825 Standards: Product and packaging rotogravure and wide-web flexographic printing.

(a) Each owner or operator of any product and packaging rotogravure or wide-web flexographic printing affected source that is subject to the requirements of this subpart shall comply with these requirements on and after the compliance dates as specified in §63.826 of this subpart.

(b) Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for the month; or to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs (b)(1) through (b)(10) of this section:

(7) Operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. If the affected source operates more than one capture system or more than one control device, and has only always-controlled work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of either paragraph (f) or (h) of this section. If the affected source operates one or more never-controlled work stations or one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of this section. Otherwise, the owner or operator shall demonstrate compliance in accordance with the procedure in paragraph (c) of this section when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of this section when emissions are controlled by an oxidizer.

(d) To demonstrate compliance with the overall organic HAP control efficiency requirement in §63.825(b)(7) or the overall organic HAP emission rate limitation requirements in §63.825(b)(8)–(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of this section:

(1) demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in paragraph (d)(1)(i) through (d)(1)(xi) of this section:

(i) Determine the oxidizer destruction efficiency (E) using the procedure in §63.827(d).

(ii) Determine the capture system capture efficiency (F) in accordance with §63.827(e)–(f).

(iii) Calculate the overall organic HAP control efficiency, (R), achieved using Equation 13.

(iv) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on materials applied, or emission of less than the calculated allowable organic HAP, measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material applied on the press or group of presses controlled by a common control device during the month.

(v) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in §63.827(b)(2).

(vi) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in §63.827(c)(2).

(vii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, calculate the organic HAP emitted during the month, H, for each month using Equation 14.

- (viii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, calculate the organic HAP emission rate based on solids applied, L, for each month using Equation 15.
- (ix) If demonstrating compliance on the basis of organic HAP emission rate based on materials applied, calculate the organic HAP emission rate based on material applied, S, using Equation 16.
- (x) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with §63.828(a)(4)–(5) whenever a product and packaging rotogravure or wide-web flexographic press is operating.
- (xi) The affected source is in compliance, if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with §63.828(a)(4) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with §63.828(a)(5) for each three hour period, and
- (A) The overall organic HAP control efficiency, R, is 95 percent or greater, or
- (B) The organic HAP emission rate based on solids applied, L, is 0.20 kg organic HAP per kg solids applied or less, or
- (C) The organic HAP emission rate based on material applied, S, is 0.04 kg organic HAP per kg material applied or less, or
- (D) The organic HAP emitted during the month, H, is less than the calculated allowable organic HAP, H_a , as determined using paragraph (e) of this section.
- (2) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency. The percent control efficiency of the oxidizer shall be demonstrated in accordance with the requirements of paragraph (c)(2) of this section except that separate continuous volumetric gas flow measurements of the inlet and outlet volumetric gas flow rates are required for an oxidizer.
- (h) If the affected source operates more than one capture system or more than one control device, and has no never-controlled work stations and no intermittently-controllable work stations, then the affected source is in compliance with the 95 percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:
- (1) The volatile matter collection and recovery efficiency, R_v , as determined by paragraphs (c)(1)(i), (c)(1)(iii), and (c)(1)(v)–(vii) of this section is equal to or greater than 95 percent, or
- (2) The overall organic HAP control efficiency as determined by paragraphs (c)(2)(iii) and (c)(2)(v)–(vii) of this section for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with §63.828(a)(5) for each three hour period, or
- (3) The overall organic HAP control efficiency as determined by paragraphs (d)(1)(i)–(iii) and (d)(1)(x) of this section for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent, the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with §63.828(a)(4) for each three hour period, and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with §63.828(a)(5) for each three hour period.

§ 63.826 Compliance dates.

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

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

(c) Affected sources which have undergone reconstruction are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment are not considered in determining whether the affected source has been reconstructed. Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs.

§ 63.827 Performance test methods.

(a) An owner or operator using a control device to comply with the requirements of §§63.825 is not required to conduct an initial performance test to demonstrate compliance if one or more of the criteria in paragraphs (a)(1) through (a)(3) of this section are met:

(1) A control device that is in operation prior to May 30, 1996, does not need to be tested if

(i) It is equipped with continuous emission monitors for determining total organic volatile matter concentration and the volumetric gas flow rate, and capture efficiency has been determined in accordance with the requirements of this subpart, such that an overall organic HAP control efficiency can be calculated, and

(ii) The continuous emission monitors are used to demonstrate continuous compliance in accordance with §63.824(b)(1)(ii), §63.825(b)(2)(ii), §63.825(c)(2), or §63.825(d)(2), as applicable, and §63.828, or

(2) The owner or operator has met the requirements of either §63.7(e)(2)(iv) or §63.7(h), or

(3) The control device is a solvent recovery system and the owner or operator chooses to comply by means of a monthly liquid-liquid material balance.

(d) A performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of §§63.824–63.825 shall be conducted by the owner or operator in accordance with the following:

(1) An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR part 60, appendix A, shall be used to determine organic volatile matter concentration, except as provided in paragraphs (d)(1)(vi)(A) through (D) of this section. The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under §63.7(c). The same method must be used for both the inlet and outlet measurements. The owner or operator may use Method 25A of 40 CFR part 60, appendix A, if

(A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less as carbon is required to comply with the standards of §§63.824–63.825, or

(B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less as carbon, or

(C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less as carbon, regardless of inlet concentration, or

(D) The control device is not an oxidizer.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using Equation 20:

$$M_f = Q_{sd} C_c [12.0] [0.0416] [10^{-4}] \quad \text{Eq. 20}$$

Where:

M_f = Total organic volatile matter mass flow rate, kg/hour (h).

Q_{sd} = Volumetric flow rate of gases entering or exiting the control device, as determined according to §63.827(d)(1)(ii), dry standard cubic meters (dscm)/h.

C_c = Concentration of organic compounds as carbon, ppmv.

12.0 = Molecular weight of carbon.

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m³) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

(ix) Emission control device efficiency shall be determined using Equation 21:

$$E = \frac{M_{f,i} - M_{f,e}}{M_{f,i}} \quad \text{Eq 21}$$

(2) The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(3) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of §§63.824–63.825.

(e) A performance test to determine the capture efficiency of each capture system venting organic emissions to a control device for the purpose of meeting the requirements of §§63.824(b)(1)(ii), 63.824(b)(2), 63.825(c)(2), 63.825(d)(1)–(2), 63.825(f)(2)–(4), or 63.825(h)(2)–(3) shall be conducted by the owner or operator in accordance with the following:

(1) You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of Method 204 of 40 CFR part 51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

(2) You may determine capture efficiency according to the protocols for testing with temporary total enclosures that are specified in Methods 204 and 204A through F of 40 CFR part 51, appendix M. You may exclude never controlled work stations from such capture efficiency determinations.

(f) As an alternative to the procedures specified in §63.827(e) an owner or operator required to conduct a capture efficiency test may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in

Appendix A of this subpart. The owner or operator may exclude never-controlled work stations from such capture efficiency determinations.

§ 63.828 Monitoring requirements.

(a) Following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the owner or operator shall monitor and inspect each control device required to comply with §§63.824–63.825 to ensure proper operation and maintenance by implementing the applicable requirements in paragraph (a)(1) through (a)(5) of this section.

(4) An owner or operator complying with the requirements of §§63.824–63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:

(i) For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or ± 1 $^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(ii) For a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or ± 1 $^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(5) An owner or operator complying with the requirements of §§63.824–63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:

(i) Submit to the Administrator with the compliance status report required by §63.9(h) of the General Provisions, a plan that

(A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,

(B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and

(C) Identifies the specific monitoring procedures;

(ii) Set the operating parameter value, or range of values, that demonstrate compliance with §§63.824–63.825, and

(iii) Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternate monitoring scheme.

(b) Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a)(4) and (a)(5) of this section, unless otherwise excused, shall be considered a violation of the emission standard.

§ 63.829 Recordkeeping requirements.

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

(b) Each owner or operator of an affected source subject to this subpart shall maintain the records specified in paragraphs (b)(1) through (b)(3) of this section on a monthly basis in accordance with the requirements of §63.10(b)(1) of this part:

(1) Records specified in §63.10(b)(2) of this part, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system

operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in §63.10(b)(3) of this part for each applicability determination performed by the owner or operator in accordance with the requirements of §63.820(a) of this subpart, and

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

(e) The owner or operator of each facility which meets the limits and criteria of §63.821(b)(1) shall maintain records as required in paragraph (e)(1) of this section. The owner or operator of each facility which meets the limits and criteria of §63.821(b)(2) shall maintain records as required in paragraph (e)(2) of this section. Owners or operators shall maintain these records for five years, and upon request, submit them to the Administrator.

(1) For each facility which meets the criteria of §63.821(b)(1), the owner or operator shall maintain records of the total mass of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

(2) For each facility which meets the criteria of §63.821(b)(2), the owner or operator shall maintain records of the total mass and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

(f) The owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of §63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator upon request:

(1) The total mass of each material applied each month on the press, including all inboard and outboard stations, and

(2) The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

§ 63.830 Reporting requirements.

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

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

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

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

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

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

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

(2) A Notification of Performance Tests specified in §63.7 and §63.9(e) of this part. This notification, and the site-specific test plan required under §63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless

explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

(3) A Notification of Compliance Status specified in §63.9(h) of this part.

(4) Performance test reports specified in §63.10(d)(2) of this part.

(5) Start-up, shutdown, and malfunction reports specified in §63.10(d)(5) of this part, except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

(i) If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in §63.6(e)(3) of this part, the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Administrator.

(ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (b)(6) of this section.

(6) A summary report specified in §63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in §63.824 or §63.825. In addition to a report of operating parameter exceedances as required by §63.10(e)(3)(i), the summary report shall include, as applicable:

(i) Exceedances of the standards in §§63.824–63.825.

(ii) Exceedances of either of the criteria of §63.820(a)(2).

(iii) Exceedances of the criterion of §63.821(b)(1) and the criterion of §63.821(b)(2) in the same month.

(iv) Exceedances of the criterion of §63.821(a)(2)(ii)(A).

TABLE 1

Applicable to General provisions reference	subpart KK	Comment
§ 63.1(a)(1)-(a)(4).....	Yes.	
§ 63.1(a)(5).....	No.....	Section reserved.
§ 63.1(a)(6)-(a)(8).....	No.	
§ 63.1(a)(9).....	No.....	Section reserved.
§ 63.1(a)(10)-(a)(14)....	Yes.	
§ 63.1(b)(1).....	No.....	Subpart KK specifies applicability.
§ 63.1(b)(2)-(b)(3).....	Yes.	
§ 63.1(c)(1).....	Yes.	
§ 63.1(c)(2).....	No.....	Area sources are not subject to subpart KK.
§ 63.1(c)(3).....	No.....	Section reserved.
§ 63.1(c)(4).....	Yes.	
§ 63.1(c)(5).....	No.	
§ 63.1(d).....	No.....	Section reserved.
§ 63.1(e).....	Yes.	
§ 63.2.....	Yes.....	Additional definitions in subpart KK.
§ 63.3(a)-(c).....	Yes.	
§ 63.4(a)(1)-(a)(3).....	Yes.	
§ 63.4(a)(4).....	No.....	Section reserved.
§ 63.4(a)(5).....	Yes.	
§ 63.4(b)-(c).....	Yes.	

§ 63.5(a)(1)-(a)(2).....	Yes.	
§ 63.5(b)(1).....	Yes.	
§ 63.5(b)(2).....	No.....	Section reserved.
§ 63.5(b)(3)-(b)(6).....	Yes.	
§ 63.5(c).....	No.....	Section reserved.
§ 63.5(d).....	Yes.	
§ 63.5(e).....	Yes.	
§ 63.5(f).....	Yes.	
§ 63.6(a).....	Yes.	
§ 63.6(b)(1)-(b)(5).....	Yes.	
§ 63.6(b)(6).....	No.....	Section reserved.
§ 63.6(b)(7).....	Yes.	
§ 63.6(c)(1)-(c)(2).....	Yes.	
§ 63.6(c)(3)-(c)(4).....	No.....	Sections reserved.
§ 63.6(c)(5).....	Yes.	
§ 63.6(d).....	No.....	Section reserved.
§ 63.6(e).....	Yes.....	Provisions pertaining to start-ups, shutdowns, malfunctions, and CMS do not apply unless an add-on control system is used
§ 63.6(f).....	Yes.	
§ 63.6(g).....	Yes.	
§ 63.6(h).....	No.....	Subpart KK does not require COMS.
§ 63.6(i)(1)-(i)(14).....	Yes.	
§ 63.6(i)(15).....	No.....	Section reserved.
§ 63.6(i)(16).....	Yes.	
§ 63.6(j).....	Yes.	
§ 63.7.....	Yes.	
§ 63.8(a)(1)-(a)(2).....	Yes.	
§ 63.8(a)(3).....	No.....	Section reserved.
§ 63.8(a)(4).....	No.....	Subpart KK specifies use of solvent recovery devices or oxidizers.
§ 63.8(b).....	Yes.	
§ 63.8(c)(1)-(3).....	Yes.	
§ 63.8(c)(4).....	No.....	Subpart KK specifies CMS sampling requirements.
§ 63.8(c)(5).....	No.....	Subpart KK does not require COMS.
§ 63.8(c)(6)-(c)(8).....	Yes.....	Provisions for COMS are not applicable.
§ 63.8(d)-(f).....	Yes.	
§ 63.8(g).....	No.....	Subpart KK specifies CMS data reduction requirements.
§ 63.9(a).....	Yes.	
§ 63.9(b)(1).....	Yes.	
§ 63.9(b)(2).....	Yes.....	Initial notification submission date extended.
§ 63.9(b)(3)-(b)(5).....	Yes.	
§ 63.9(c)-(e).....	Yes.	
§ 63.9(f).....	No.....	Subpart KK does not require opacity and visible emissions observations.
§ 63.9(g).....	Yes.....	Provisions for COMS are not applicable.
§ 63.9(h)(1)-(h)(3).....	Yes.	
§ 63.9(h)(4).....	No.....	Section reserved.
§ 63.9(h)(5)-(h)(6).....	Yes.	
§ 63.9(i).....	Yes.	
§ 63.9(j).....	Yes.	
§ 63.10(a).....	Yes.	
§ 63.10(b)(1)-(b)(3).....	Yes.	
§ 63.10(c)(1).....	Yes.	
§ 63.10(c)(2)-(c)(4).....	No.....	Sections reserved.
§ 63.10(c)(5)-(c)(8).....	Yes.	

§ 63.10(c)(9).....	No.....	Section reserved.
§ 63.10(c)(10)-(c)(15)...	Yes.	
§ 63.10(d)(1)-(d)(2).....	Yes.	
§ 63.10(d)(3).....	No.....	Subpart KK does not require opacity and visible emissions observations.
§ 63.10(d)(4)-(d)(5).....	Yes.	
§ 63.10(e).....	Yes.....	Provisions for COMS are not applicable.
§ 63.10(f).....	Yes.	
§ 63.11.....	No.....	Subpart KK specifies use of solvent recovery devices or oxidizers.
§ 63.12.....	Yes.	
§ 63.13.....	Yes.	
§ 63.14.....	Yes.	
§ 63.15.....	Yes.	

Attachment B, NESHAP Subpart EEEE

**Avery Dennison PFD
650 West 67th Avenue
Scherverville, Indiana 46375**

Permit No.: 089-18134-00062

National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline)

40 CFR 63.2334 Am I subject to this subpart?

(a) Except as provided for in paragraphs (b) and (c) of this section, you are subject to this subpart if you own or operate an OLD operation that is located at, or is part of, a major source of HAP emissions. An OLD operation may occupy an entire plant site or be collocated with other industrial (e.g., manufacturing) operations at the same plant site.

40 CFR 63.2338 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, or existing OLD operation affected source.

(b) Except as provided in paragraph (c) of this section, the affected source is the collection of activities and equipment used to distribute organic liquids into, out of, or within a facility that is a major source of HAP. The affected source is composed of:

(1) All storage tanks storing organic liquids.

(2) All transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers.

(3) All equipment leak components in organic liquids service that are associated with:

(i) Storage tanks storing organic liquids;

(ii) Transfer racks loading or unloading organic liquids;

(iii) Pipelines that transfer organic liquids directly between two storage tanks that are subject to this subpart;

(iv) Pipelines that transfer organic liquids directly between a storage tank subject to this subpart and a transfer rack subject to this subpart; and

(v) Pipelines that transfer organic liquids directly between two transfer racks that are subject to this subpart.

(4) All transport vehicles while they are loading or unloading organic liquids at transfer racks subject to this subpart.

(5) All containers while they are loading or unloading organic liquids at transfer racks subject to this subpart.

(c) The equipment listed in paragraphs (c)(1) through (4) of this section and used in the identified operations is excluded from the affected source.

(1) Storage tanks, transfer racks, transport vehicles, containers, and equipment leak components that are part of an affected source under another 40 CFR part 63 national emission standards for hazardous air pollutants (NESHAP).

(2) Non-permanent storage tanks, transfer racks, transport vehicles, containers, and equipment leak components when used in special situation distribution loading and unloading operations (such as maintenance or upset liquids management).

(3) Storage tanks, transfer racks, transport vehicles, containers, and equipment leak components when used to conduct maintenance activities, such as stormwater management, liquid removal from tanks for inspections and maintenance, or changeovers to a different liquid stored in a storage tank.

(f) An affected source is existing if it is not new or reconstructed.

40 CFR 63.2342 When do I have to comply with this subpart?

(b)(1) If you have an existing affected source, you must comply with the emission limitations, operating limits, and work practice standards for existing affected sources no later than February 5, 2007, except as provided in paragraphs (b)(2) and (3) of this section.

(d) You must meet the notification requirements in 40 CFR 40 CFR 63.2343 and 63.2382(a), as applicable, according to the schedules in 40 CFR 63.2382(a) and (b)(1) through (3) and in subpart A of this part. Some of these notifications must be submitted before the compliance dates for the emission limitations, operating limits, and work practice standards in this subpart.

40 CFR 63.2343 What are my requirements for emission sources not requiring control?

This section establishes the notification, recordkeeping, and reporting requirements for emission sources identified in 40 CFR 63.2338 that do not require control under this subpart (i.e., under paragraphs (a) through (e) of 40 CFR 63.2346). Such emission sources are not subject to any other notification, recordkeeping, or reporting sections in this subpart, including 40 CFR 63.2350(c), except as indicated in paragraphs (a) through (d) of this section.

(a) For each storage tank subject to this subpart having a capacity of less than 18.9 cubic meters (5,000 gallons) and for each transfer rack subject to this subpart that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), you must keep documentation that verifies that each storage tank and transfer rack identified in paragraph (a) of this section is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form in a separate location. The documentation may consist of identification of the tanks and transfer racks identified in paragraph (a) of this section on a plant site plan or process and instrumentation diagram (P&ID).

(d) If one or more of the events identified in paragraphs (d)(1) through (4) of this section occur since the filing of the Notification of Compliance Status or the last Compliance report, you must submit a subsequent Compliance report as specified in paragraphs (b)(3) and (c)(3) of this section.

(1) Any storage tank or transfer rack became subject to control under this subpart EEEE; or

(2) Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of this subpart; or

(3) Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or

(4) Any of the information required in 40 CFR 63.2386(c)(1), 40 CFR 63.2386(c)(2), or 40 CFR 63.2386(c)(3) has changed.

Notifications, Reports, and Records

40 CFR 63.2382 What notifications must I submit and when and what information should be submitted?

(a) You must submit each notification in subpart SS of this part, Table 12 to this subpart, and paragraphs (b) through (d) of this section that applies to you. You must submit these notifications according to the schedule in Table 12 to this subpart and as specified in paragraphs (b) through (d) of this section.

(b)(1) Initial Notification. If you startup your affected source before February 3, 2004, you must submit the Initial Notification no later than 120 calendar days after February 3, 2004.

40 CFR 63.2386 What reports must I submit and when and what information is to be submitted in each?

(a) You must submit each report in subpart SS of this part, Table 11 to this subpart, Table 12 to this subpart, and in paragraphs (c) through (e) of this section that applies to you.

(c) First Compliance report. The first Compliance report must contain the information specified in paragraphs (c)(1) through (10) of this section.

(1) Company name and address.

(2) Statement by a responsible official, including the official's name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

(3) Date of report and beginning and ending dates of the reporting period.

(d) Subsequent Compliance reports. Subsequent Compliance reports must contain the information in paragraphs (c)(1) through (9) of this section and, where applicable, the information in paragraphs (d)(1) through (4) of this section.

(3)(i) A listing of any storage tank that became subject to controls based on the criteria for control specified in table 2 to this subpart, items 1 through 6, since the filing of the last Compliance report.

(ii) A listing of any transfer rack that became subject to controls based on the criteria for control specified in table 2 to this subpart, items 7 through 10, since the filing of the last Compliance report.

(4)(i) A listing of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of this subpart, since the last Compliance report.

40 CFR 63.2390 What records must I keep?

(a) For each emission source identified in 40 CFR 63.2338 that does not require control under this subpart, you must keep all records identified in 40 CFR 63.2343.

(d) You must keep records of the total actual annual facility-level organic liquid loading volume as defined in 40 CFR 63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in table 2 to this subpart, items 7 through 10.

40 CFR 63.2394 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form at a separate location.

(b) As specified in 40 CFR 63.10(b)(1), you must keep your files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). You may keep the records off site for the remaining 3 years.

40 CFR 63.2398 What parts of the General Provisions apply to me?

Table 12 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to you.

40 CFR 63.2402 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. Environmental Protection Agency (U.S. EPA) or a delegated authority such as your State, local, or eligible tribal agency. If the EPA Administrator has delegated authority to your State, local, or eligible tribal agency, then that agency, as well as the EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office (see list in 40 CFR 63.13) to find out if this subpart is delegated to your State, local, or eligible tribal agency.

(b) In delegating implementation and enforcement authority for this subpart to a State, local, or eligible tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraphs (b)(1) through (4) of this section are retained by the EPA Administrator and are not delegated to the State, local, or eligible tribal agency.

(1) Approval of alternatives to the nonopacity emission limitations, operating limits, and work practice standards in 40 CFR 63.2346(a) through (c) under 40 CFR 63.6(g).

(2) Approval of major changes to test methods under 40 CFR 63.7(e)(2)(ii) and (f) and as defined in 40 CFR 63.90.

(3) Approval of major changes to monitoring under 40 CFR 63.8(f) and as defined in 40 CFR 63.90.

(4) Approval of major changes to recordkeeping and reporting under 40 CFR 63.10(f) and as defined in 40 CFR 63.90.

40 CFR 63.2406 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, 40 CFR part 63, subparts H, PP, SS, TT, UU, and WW, and in this section. If the same term is defined in another subpart and in this section, it will have the meaning given in this section for purposes of this subpart. Notwithstanding the introductory language in 40 CFR 63.921, the terms "container" and "safety device" shall have the meaning found in this subpart and not in 40 CFR 63.921.

Actual annual average temperature, for organic liquids, means the temperature determined using the following methods:

(1) For heated or cooled storage tanks, use the calculated annual average temperature of the stored organic liquid as determined from a design analysis of the storage tank.

(2) For ambient temperature storage tanks:

(i) Use the annual average of the local (nearest) normal daily mean temperatures reported by the National Climatic Data Center; or

(ii) Use any other method that the EPA approves.

Annual average true vapor pressure means the equilibrium partial pressure exerted by the total table 1 organic HAP in the stored or transferred organic liquid. For the purpose of determining if a liquid meets the definition of an organic liquid, the vapor pressure is determined using standard conditions of 77 degrees F and 29.92 inches of mercury. For the purpose of determining whether an organic liquid meets the applicability criteria in table 2, items 1 through 6, to this subpart, use the actual annual average temperature as defined in this subpart. The vapor pressure value in either of these cases is determined:

(1) In accordance with methods described in American Petroleum Institute Publication 2517, Evaporative Loss from External Floating-Roof Tanks (incorporated by reference, see 40 CFR 63.14);

(2) Using standard reference texts;

(3) By the American Society for Testing and Materials Method D2879–83, 96 (incorporated by reference, see 40 CFR 63.14); or

(4) Using any other method that the EPA approves.

Bottoms receiver means a tank that collects distillation bottoms before the stream is sent for storage or for further processing downstream.

Cargo tank means a liquid-carrying tank permanently attached and forming an integral part of a motor vehicle or truck trailer. This term also refers to the entire cargo tank motor vehicle or trailer. For the purpose of this subpart, vacuum trucks used exclusively for maintenance or spill response are not considered cargo tanks.

Closed vent system means a system that is not open to the atmosphere and is composed of piping, ductwork, connections, and, if necessary, flow-inducing devices that transport gas or vapors from an emission point to a control device. This system does not include the vapor collection system that is part of some transport vehicles or the loading arm or hose that is used for vapor return. For transfer racks, the closed vent system begins at, and includes, the first block valve on the downstream side of the loading arm or hose used to convey displaced vapors.

Combustion device means an individual unit of equipment, such as a flare, oxidizer, catalytic oxidizer, process heater, or boiler, used for the combustion of organic emissions.

Container means a portable unit in which a material can be stored, transported, treated, disposed of, or otherwise handled. Examples of containers include, but are not limited to, drums and portable cargo containers known as “portable tanks” or “totes.”

Control device means any combustion device, recovery device, recapture device, or any combination of these devices used to comply with this subpart. Such equipment or devices include, but are not limited to, absorbers, adsorbers, condensers, and combustion devices. Primary condensers, steam strippers, and fuel gas systems are not considered control devices.

Crude oil means any of the naturally occurring liquids commonly referred to as crude oil, regardless of specific physical properties. Only those crude oils downstream of the first point of custody transfer after the production field are considered crude oils in this subpart.

Custody transfer means the transfer of hydrocarbon liquids after processing and/or treatment in the producing operations, or from storage tanks or automatic transfer facilities to pipelines or any other forms of transportation.

Design evaluation means a procedure for evaluating control devices that complies with the requirements in 40 CFR 63.985(b)(1)(i).

Deviation means any instance in which an affected source subject to this subpart, or portion thereof, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart, and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during SSM.

Emission limitation means an emission limit, opacity limit, operating limit, or visible emission limit.

Equipment leak component means each pump, valve, and sampling connection system used in organic liquids service at an OLD operation. Valve types include control, globe, gate, plug, and ball. Relief and check valves are excluded.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals (4.0 pounds per square inch absolute (psia)) or greater which is used as a fuel for internal combustion engines. Aviation gasoline is included in this definition.

High throughput transfer rack means those transfer racks that transfer into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) a total of 11.8 million liters per year or greater of organic liquids.

In organic liquids service means that an equipment leak component contains or contacts organic liquids having 5 percent by weight or greater of the organic HAP listed in Table 1 to this subpart.

Low throughput transfer rack means those transfer racks that transfer into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) less than 11.8 million liters per year of organic liquids.

On-site or on site means, with respect to records required to be maintained by this subpart or required by another subpart referenced by this subpart, that records are stored at a location within a major source which encompasses the affected source. On-site includes, but is not limited to, storage at the affected source to which the records pertain, storage in central files elsewhere at the major source, or electronically available at the site.

Organic liquid means:

(1) Any non-crude oil liquid or liquid mixture that contains 5 percent by weight or greater of the organic HAP listed in Table 1 to this subpart, as determined using the procedures specified in 40 CFR 63.2354(c).

(2) Any crude oils downstream of the first point of custody transfer.

(3) Organic liquids for purposes of this subpart do not include the following liquids:

(i) Gasoline (including aviation gasoline), kerosene (No. 1 distillate oil), diesel (No. 2 distillate oil), asphalt, and heavier distillate oils and fuel oils;

(ii) Any fuel consumed or dispensed on the plant site directly to users (such as fuels for fleet refueling or for refueling marine vessels that support the operation of the plant);

(iii) Hazardous waste;

(iv) Wastewater;

(v) Ballast water: or

(vi) Any non-crude oil liquid with an annual average true vapor pressure less than 0.7 kilopascals (0.1 psia).

Organic liquids distribution (OLD) operation means the combination of activities and equipment used to store or transfer organic liquids into, out of, or within a plant site regardless of the specific activity being performed. Activities include, but are not limited to, storage, transfer, blending, compounding, and packaging.

Permitting authority means one of the following:

(1) The State Air Pollution Control Agency, local agency, or other agency authorized by the EPA Administrator to carry out a permit program under 40 CFR part 70; or

(2) The EPA Administrator, in the case of EPA-implemented permit programs under title V of the CAA (42 U.S.C. 7661) and 40 CFR part 71.

Plant site means all contiguous or adjoining surface property that is under common control, including surface properties that are separated only by a road or other public right-of-way. Common control includes surface properties that are owned, leased, or operated by the same entity, parent entity, subsidiary, or any combination.

Research and development facility means laboratory and pilot plant operations whose primary purpose is to conduct research and development into new processes and products, where the operations are under the close supervision of technically trained personnel, and which are not engaged in the manufacture of products for commercial sale, except in a de minimis manner.

Responsible official means responsible official as defined in 40 CFR 70.2 and 40 CFR 71.2, as applicable.

Safety device means a closure device such as a pressure relief valve, frangible disc, fusible plug, or any other type of device that functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned, accidental, or emergency event.

Shutdown means the cessation of operation of an OLD affected source, or portion thereof (other than as part of normal operation of a batch-type operation), including equipment required or used to comply with this subpart, or the emptying and degassing of a storage tank. Shutdown as defined here includes, but is not limited to, events that result from periodic maintenance, replacement of equipment, or repair.

Startup means the setting in operation of an OLD affected source, or portion thereof (other than as part of normal operation of a batch-type operation), for any purpose. Startup also includes the placing in operation of any individual piece of equipment required or used to comply with this subpart including, but not limited to, control devices and monitors.

Storage tank means a stationary unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, or reinforced plastic) that provide structural support and is designed to hold a bulk quantity of liquid. Storage tanks do not include:

(1) Units permanently attached to conveyances such as trucks, trailers, rail cars, barges, or ships;

(2) Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere;

(3) Bottoms receivers;

(4) Surge control vessels;

(5) Vessels storing wastewater; or

(6) Reactor vessels associated with a manufacturing process unit.

Surge control vessel means feed drums, recycle drums, and intermediate vessels. Surge control vessels are used within chemical manufacturing processes when in-process storage, mixing, or management of flow rates or volumes is needed to assist in production of a product.

Tank car means a car designed to carry liquid freight by rail, and including a permanently attached tank.

Total actual annual facility-level organic liquid loading volume means the total facility-level actual volume of organic liquid loaded for transport within or out of the facility through transfer racks that are part of the affected source into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) based on a 3-year rolling average, calculated annually.

(1) For existing affected sources, each 3-year rolling average is based on actual facility-level loading volume during each calendar year (January 1 through December 31) in the 3-year period. For calendar year 2004 only (the first year of the initial 3-year rolling average), if an owner or operator of an affected source does not have actual loading volume data for the time period from January 1, 2004, through February 2, 2004 (the time period prior to the effective date of the OLD NESHAP), the owner or operator shall compute a facility-level loading volume for this time period as follows: At the end of the 2004 calendar year, the owner or operator shall calculate a daily average facility-level loading volume (based on the actual loading volume for February 3, 2004, through December 31, 2004) and use that daily average to estimate the facility-level loading volume for the period of time from January 1, 2004, through February 2, 2004. The owner or operator shall then sum the estimated facility-level loading volume from January 1, 2004, through February 2, 2004, and the actual facility-level loading volume from February 3, 2004, through December 31, 2004, to calculate the annual facility-level loading volume for calendar year 2004.

(2)(i) For new affected sources, the 3-year rolling average is calculated as an average of three 12-month periods. An owner or operator must select as the beginning calculation date with which to start the calculations as either the initial startup date of the new affected source or the first day of the calendar month following the month in which startup occurs. Once selected, the date with which the calculations begin cannot be changed.

(ii) The initial 3-year rolling average is based on the projected maximum facility-level annual loading volume for each of the 3 years following the selected beginning calculation date. The second 3-year rolling average is based on actual facility-level loading volume for the first year of operation plus a new projected maximum facility-level annual loading volume for second and third years following the selected beginning calculation date. The third 3-year rolling average is based on actual facility-level loading volume for the first 2 years of operation plus a new projected maximum annual facility-level loading volume for the third year following the beginning calculation date. Subsequent 3-year rolling averages are based on actual facility-level loading volume for each year in the 3-year rolling average.

Transfer rack means a single system used to load organic liquids into, or unload organic liquids out of, transport vehicles or containers. It includes all loading and unloading arms, pumps, meters, shutoff valves, relief valves, and other piping and equipment necessary for the transfer operation. Transfer equipment and operations that are physically separate (i.e., do not share common piping, valves, and other equipment) are considered to be separate transfer racks.

Transport vehicle means a cargo tank or tank car.

Vapor balancing system means:

(1) A piping system that collects organic HAP vapors displaced from transport vehicles or containers during loading and routes the collected vapors to the storage tank from which the liquid being loaded originated or to another storage tank connected to a common header. For containers, the piping system must route the displaced vapors directly to the appropriate storage tank or to another storage tank connected to a common header in order to qualify as a vapor balancing system; or

(2) A piping system that collects organic HAP vapors displaced from the loading of a storage tank and routes the collected vapors to the transport vehicle from which the storage tank is filled.

Vapor collection system means any equipment located at the source (i.e., at the OLD operation) that is not open to the atmosphere; that is composed of piping, connections, and, if necessary, flow-inducing devices; and that is used for:

(1) Containing and conveying vapors displaced during the loading of transport vehicles to a control device;

(2) Containing and directly conveying vapors displaced during the loading of containers; or

(3) Vapor balancing. This does not include any of the vapor collection equipment that is installed on the transport vehicle.

Vapor-tight transport vehicle means a transport vehicle that has been demonstrated to be vapor-tight. To be considered vapor-tight, a transport vehicle equipped with vapor collection equipment must undergo a pressure change of no more than 250 pascals (1 inch of water) within 5 minutes after it is pressurized to 4,500 pascals (18 inches of water). This capability must be demonstrated annually using the procedures specified in EPA Method 27 of 40 CFR part 60, appendix A. For all other transport vehicles, vapor tightness is demonstrated by performing the U.S. DOT pressure test procedures for tank cars and cargo tanks.

Work practice standard means any design, equipment, work practice, or operational standard, or combination thereof, that is promulgated pursuant to section 112(h) of the CAA.

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

**Addendum to the Technical Support Document
for a Part 70 Operating Permit Renewal**

Source Background and Description

Source Name: Avery Dennison PFD
Source Location: 650 West 67th Avenue, Schererville, Indiana 46375-1390
County: Lake
SIC Code: 2754, 2816
Operation Permit No.: T089-18134-00062
Permit Reviewer: ERG/ST

On March 14, 2008, the Office of Air Quality (OAQ) had a notice published in The Post Tribune, Merrillville, Indiana, stating that Avery Dennison PFD had applied for a Part 70 Operating Permit Renewal to operate a stationary commercial gravure printing and pigment and lacquer manufacturing operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 3, 2008, Avery Dennison PFD submitted comments on the proposed Part 70 Operating Permit Renewal. The summary of the comments is as follows:

Comment 1: In Condition A.2, Section D.1, and TSD, Avery requests that the line speed and web width be removed from the emission unit descriptions to be consistent with the description of the remaining Coaters, C-7, C-8, C-10, and Texmac. By providing the line speed and web width, Avery feels that their competition will obtain a competitive advantage. Although the line speed and web width affects the emissions of the unit, the facility has accepted usage limitations and tracks the total VOC usage on each coater to determine emissions. Therefore, the line speed and web width are not necessary in the unit description.

IDEM Response to Comment 1: The permit has been changed as follows:

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

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

...

- (c) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, ~~which has a maximum line speed of 1,500 feet per minute (ft/min), and a maximum printing width of 71 inches~~ **with emissions** controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (d) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, ~~which has a maximum line speed of 300 ft/min, and a maximum printing width of 39 inches. Emissions will be~~ **with emissions** controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- (c) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, ~~which has a maximum line speed of 1,500 feet per minute (ft/min), and a maximum printing width of 74 inches~~ **with emissions** controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (d) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, ~~which has a maximum line speed of 300 ft/min, and a maximum printing width of 39 inches. Emissions will be~~ **with emissions** controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.

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

Comment 2: Avery requests that the language in Condition B.10, Preventative Maintenance Plan and the D Sections be changed as follows to require Preventative Maintenance Plans for emission units C-7, C-8, C-9, C-10, C-11, Texmac, 715, and Myers Mixer.

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

- (a) ~~The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:~~ **If required by specific Conditions in Section D of this permit, the Permittee shall maintain and implement Preventative Maintenance Plans (PMPs) including the following information on each facility:**

IDEM Response to Comment 2: Preventative Maintenance Plan requirements will be added to the D sections for the specific emissions units as requested. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. The permit has been changed as follows:

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

- (a) ~~The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source~~ **If required by specific conditions in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs)** as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units C-7, C-8, C-9, C-10, C-11, and Texmac and their control devices.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units 715 and Myers Mixer and its control device.

The other conditions in Section D.1 and D.2 of the permit have been re-numbered accordingly.

Comment 3: Avery requests that the PSD and Emission Offset Minor Limit for Press C-11 in Condition D.1.1(b) be revised to require an overall control efficiency of 99% rather than an hourly emission limit of 5.01 pounds per hour. The unlimited potential annual VOC input to the C-11 press is 2,194 tons and when coupled with the 99% control efficiency, the VOCs will be limited to less than 21.94 tons/year, which is sufficient to ensure that the facility does not exceed the Emission Offset Rule major modification threshold. The permit should read as follows:

D.1.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]

...

- (b) Pursuant to Significant Source Modification 089-23352-00062, issued on February 27, 2007, the VOC emissions from press C-11 shall be ~~limited to less than 5.01 pounds per hour.~~ **controlled by a thermal oxidizer with a minimum overall VOC control efficiency of 99.0%.**

IDEM Response to Comment 3: In the Technical Support Document for Significant Source Modification 089-23352-00062, the potential to emit of VOC of press C-11 prior to controls was calculated to be 2,194 tons per year. Significant Source Modification 089-23352-00062 limited the potential to emit of VOC of Press C-11 after controls to 21.94 tons per year. The increase in PTE of VOC due to the modifications done under SSM 089-23352-00062 must be limited to less than the 40 ton per year applicability threshold for 326 IAC 2-3 (Emission Offset). IDEM has reconsidered the PTE limits and has revised these limits. The discussion in the *State Rule Applicability – Entire Source - 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)* section of the Technical Support Document should read as follows:

" In 2007, the source added two (2) pigment mixers (PP-1 and PP-2) and one (1) press (C-11) under SSM 089-23352-00062, issued February 27, 2007. The increase in PTE of VOC due to this modification (2,214 tons per year) is greater than the significant level of 40 tons per year. ~~However, the permit included requirements that VOC emissions from the press be controlled at an overall efficiency of at least 99%, (this is equivalent to an emission limit of 5.01 pounds of VOC per hour) for a PTE after controls of 21.94 tons per year.~~ The PTE of the pigment mixers (PP-2 and M 715) after integral control is 9.63 tons per year. The two mixers are also limited by an existing limit on all pigment production facilities of 24.0 tons per year. **Since the permit must limit the increase in VOC to less than the 40 ton per year applicability threshold for 326 IAC 2-3, the press C-11 will be limited to 2,194 tons of VOC input and a control efficiency of 98.6%. This is equivalent to a PTE of 30.17 tons of VOC per year after controls for press C-11.** The ~~total~~ **total** increase in PTE of VOC after controls and limits (~~34.6~~ **39.8** tons per year) is less than the 40 ton per year applicability threshold for 326 IAC 2-3. The increase in NOx emissions (0.73 tons per year) due to this modification is less than the 40 ton per year applicability threshold for 326 IAC 2-3. Therefore, Emission Offset review was not triggered. The source-wide PTE of all attainment pollutants remained less than the 250 ton per year major source thresholds for 326 IAC 2-2 (PSD). Therefore, the requirements of PSD did not apply." The permit has been changed as follows:

D.1.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]

...

- (b) Pursuant to Significant Source Modification 089-23352-00062, issued on February 27, 2007, **and as revised in T089-18134-00062, the Permittee shall comply with the following:** ~~the VOC emissions from press C-11 shall be limited to less than 5.01 pounds per hour.~~
- (1) **The input of VOC to press C-11, including cleanup solvent, shall be limited to 2,194 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
 - (2) **The minimum overall VOC control efficiency for the thermal oxidizers for press C-11 shall be 98.6%.**

Compliance with the above limits shall render the requirements of 326 IAC 2-3 (Emission Offset) not applicable to the modifications performed in 2007 under SSM 089-23352-00062.

D.1.8 D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), (b), and (c), the Permittee shall maintain the following records for the presses identified as C-8, C-9, C-10, and C-11 in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits and thermal oxidizer temperature requirements established in Conditions D.1.1(a), (b), and (c),
- (1) The amount and VOC content of each ink, coating material, wash, and cleanup solvent used on a monthly basis for presses C-8, C-9, ~~and C-10,~~ **and C-11.** Records shall include purchase orders, invoices, supplier data sheets, material safety data sheets (MSDS), and lacquer and pigment product formulation data necessary to verify the type and amount used.
 - (2) The total VOC usage for each month for presses C-8, C-9, ~~and C-10,~~ **and C-11.**
 - (3) The continuous thermal oxidizer temperature for presses C-8, C-9, C-10, and C-11.
 - (4) The weight of VOCs emitted for each compliance period for presses C-8, C-9, ~~and C-10,~~ **and C-11.**

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

Part 70 Quarterly Report

Source Name:	Avery Dennison PFD
Source Address:	650 West 67th Avenue, Scherverville, Indiana
Mailing Address:	650 West 67th Avenue, Scherverville, Indiana
Part 70 Permit No.:	089-18134-00062
Facility:	Press C-11
Parameter:	Input of VOC
Limit:	Less than 2,194 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

Comment 4: Avery requests that the language in Condition D.1.3 be changed from “the press is in operation” to “the coater is wetted and VOC materials are being applied” because the coaters can run web through the press without applying solvent. If solvent is not being applied, there will be no emissions.

IDEM Response to Comment 4: The permit has been changed as follows:

D.1.3 D.1.4 VOC Control [326 IAC 8-1-2(a)] [326 IAC 8-5-5]

Pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-5-5, and in order to achieve compliance with Conditions D.1.1 and D.1.2:

- (a) The Permittee shall operate the thermal oxidizer controlling emissions from press C-9 at all times the ~~press is in operation.~~ **coater is wetted and VOC materials are being applied.**
- (b) The Permittee shall operate the thermal oxidizer controlling emissions from press C-11 at all times the ~~press is in operation.~~ **coater is wetted and VOC materials are being applied.**
- (c) The Permittee shall operate the thermal oxidizing incinerator controlling emissions from the two (2) rotogravure printing presses identified as C-7 and C-10 and the one (1) pilot packaging rotogravure printing press, identified as Texmac, at all times that any of ~~these presses are in operation.~~ **coaters are is wetted and VOC materials are being applied.**
- (d) The Permittee shall operate the thermal oxidizer controlling emissions from press C-8 at all times the ~~press is in operation.~~ **coater is wetted and VOC materials are being applied.**

Comment 5: Avery requests that the table in Condition D.1.4 - Testing Requirements be removed from the permit. In addition to testing requirements stated in this condition, Avery is also subject to 326 IAC 8-1-12, which requires that facilities using control devices to demonstrate compliance with 326 IAC 8-5-5 to test the control system every 30 months. This table can be misleading because the testing dates listed are for five years from the most recent stack test, when Avery actually has to test every 30 months. Furthermore, this table requires that Avery demonstrate compliance with 5.01 pounds of VOCs per hour. We have requested that the hourly emission limit be removed and the emissions from C-11 be limited by requiring the overall VOC control efficiency to be limited to 99.0%.

IDEM Response to Comment 5: Condition D.1.4 restates requirements that are already stated in other conditions (D.1.1, D.1.2, and D.1.5) in the permit and is therefore unnecessary. The permit has been changed as follows:

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)] 326 IAC 2-1.1-11]~~

~~The Permittee shall perform VOC testing as shown in the table below using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration.~~

Press	Test Date	Test Frequency	Emission Limit (Rule)
C-7, C-10, Texmac	Prior to October 2011	Every five (5) years	All: 90% destruction (326 IAC 8-5-5) Press C-10: 95% destruction (326 IAC 2-2)
C-8	Prior to May 2012		90% destruction (326 IAC 8-5-5) 95% destruction (326 IAC 2-2)
C-9	Prior to August 2011		90% destruction (326 IAC 8-5-5) 98.5% destruction (326 IAC 2-3)
C-11	Prior to June 2012		90% destruction (326 IAC 8-5-5) 5.01 pounds per hour (326 IAC 2-3)

Comment 6: Avery requests that IDEM revise condition D.1.5(c)(7). The capture systems, control devices, and monitoring equipment for the printing presses and thermal oxidizers does not have daily maintenance requirements. Avery requests that this condition be clarified to reflect that maintenance activities are not scheduled on a daily basis. When maintenance is performed on the capture system, control device, and/or monitoring equipment, Avery will maintain all required records.

IDEM Response to Comment 6: IDEM recognizes that maintenance for the capture systems, control devices, and monitoring equipment for the printing presses and thermal oxidizers may not necessarily need to be performed daily to ensure that these systems operate properly. Condition D.1.5(c)(7) has been revised as follows:

~~D.1.5 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-9] [326 IAC 8-1-12]~~

~~...~~

~~(c) Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day and maintain all of the following information each day for each coating facility:~~

~~...~~

~~(6) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.~~

- (d) Pursuant to 326 IAC 8-1-12, the Permittee shall collect, record, and maintain for each coating facility a ~~(7)~~—A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

Comment 7: Avery requests that Condition D.1.6 - Thermal Oxidizer Operation be revised to allow the oxidizers a 50 degree fluctuation in temperature. It is difficult to maintain the temperature at exactly the setpoint. The oxidizers for all of the coaters are set up such that if the temperature were to fall below 50 degrees F of the setpoint, the press is automatically shut-down. Also, Condition D.1.5(c)(5)(B) allows for the temperature to fall less than 50 degrees F below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance. Please revise the permit as follows:

D.1.6 Thermal Oxidizer Operation

...

- (b) From the date the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall operate the thermal oxidizers at **no lower than 50 degrees F of** the set point temperature (minimum temperature) as observed during the compliant stack test.
- (1) The Permittee shall operate the thermal oxidizer's temperature for press C-9 at the temperature of **no lower than 50 degrees F of** 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(a) and D.1.2, as determined during compliance tests.
 - (2) The Permittee shall operate the thermal oxidizer's temperature for press C-11 at the temperature of **no lower than 50 degrees F of** 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(b) and D.1.2, as determined during compliance tests.
 - (3) The Permittee shall operate the thermal oxidizer's temperature for presses C-7, C-10, and Texmac at the temperature of **no lower than 50 degrees F of** 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(c) and D.1.2, as determined during compliance tests.
 - (4) The Permittee shall operate the thermal oxidizer's temperature for press C-8 at the temperature of **no lower than 50 degrees F of** 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(c) and D.1.2, as determined during compliance tests.

D.1.7 Parametric Monitoring Requirements (Thermal Oxidizer Temperature)

- (a) A continuous monitoring system for measuring the operating temperature shall be calibrated, maintained, and operated on the thermal oxidizers used to control emissions from the presses C-7, C-8, C-9, C-10, C-11, and Texmac. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded. From the date of startup until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at **no lower than 50 degrees F below** ~~or above~~ 1,400°F.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at **no lower than 50 degrees F of** ~~or above~~ the minimum temperature as observed during the compliant stack test.

The Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the temperature of the each thermal oxidizer falls below **50 degrees F of 1,400°F** or the minimum temperature determined during the most recent valid stack test. A temperature that is below **50 degrees F of 1,400°F** or the minimum temperature determined during the most recent valid stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

IDEM Response to Comment 7: These two conditions require the Permittee to operate the thermal oxidizers at a temperature that will ensure compliance with the emission standards in Conditions D.1.1 and D.1.2 at all times that the presses are in operation. IDEM has determined that the Permittee will be able to comply with the limit if the three hour average temperature of the thermal oxidizers remains within fifty (50) degrees F of the temperature determined during the compliant stack test. The permit has been changed as follows:

D.1.6 Thermal Oxidizer Operation and Parametric Monitoring Requirements

- ~~(a) The Permittee shall determine the set point temperature (minimum temperature) from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.~~
- ~~(b) From the date the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall operate the thermal oxidizers at the set point temperature (minimum temperature) as observed during the compliant stack test.~~
- ~~(1) The Permittee shall operate the thermal oxidizer's temperature for press C-9 at the temperature of 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(a) and D.1.2, as determined during compliance tests.~~
- ~~(2) The Permittee shall operate the thermal oxidizer's temperature for press C-11 at the temperature of 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(b) and D.1.2, as determined during compliance tests.~~
- ~~(3) The Permittee shall operate the thermal oxidizer's temperature for presses C-7, C-10, and Texmac at the temperature of 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(c) and D.1.2, as determined during compliance tests.~~
- ~~(4) The Permittee shall operate the thermal oxidizer's temperature for press C-8 at the temperature of 1400 degrees F or the temperature that results in compliance with Conditions D.1.1(c) and D.1.2, as determined during compliance tests.~~
- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For the purposes of measuring temperature, continuous shall mean no less often then once per fifteen (15) minutes.**
- (b) The specified temperature value for each thermal oxidizer is the three (3) hour average temperature during the most recent control device performance test that demonstrates compliance with the limits in Condition D.1.1 as approved by IDEM, at which the destruction efficiency was determined. If a condition exists which would result in response steps, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances or whenever a three (3) hour average temperature is more than 28 degrees C (50 degrees F) below 1,400 degrees F. A three (3) hour average temperature that is more than 28 degrees C (50 degrees F) below 1,400 degrees F is not considered a deviation from this permit. Failure to take response steps in accordance with**

Section C – Response to Excursion or Exceedances shall be considered a deviation from this permit.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate steps in accordance with Section C - Response to Excursion or Exceedances whenever a three (3) hour average temperature is more than 28 degrees C (50 degrees F) below the three (3) hour average temperature observed during the compliance stack test. A three (3) hour average temperature that remains more than 28 degrees C (50 degrees F) below the observed temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances shall be considered a deviation from this permit.

~~D.1.7 Parametric Monitoring Requirements (Thermal Oxidizer Temperature)~~

- ~~(a) A continuous monitoring system for measuring the operating temperature shall be calibrated, maintained, and operated on the thermal oxidizers used to control emissions from the presses C-7, C-8, C-9, C-10, C-11, and Texmac. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded. From the date of startup until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above 1,400°F.~~
- ~~(b) The Permittee shall determine the minimum temperature from the most recent valid stack test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2, as approved by IDEM.~~
- ~~(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the minimum temperature as observed during the compliant stack test.~~

~~The Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the temperature of the each thermal oxidizer falls below 1,400°F or the minimum temperature determined during the most recent valid stack test. A temperature that is below 1,400°F or the minimum temperature determined during the most recent valid stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.~~

Comment 8: The emission factor referenced in Condition D.2.1 - Volatile Organic Compound (VOC) and Emission Offset Minor Limit is incorrect. The correct factor is 0.0694 tons of VOC per ton of pigment. This emission factor was derived by the source when conducting a technical analysis during the review of previously issued Construction Permit 089-3522-00062. Avery uses this emission factor when calculating emissions from the pigment production process. Avery requests that the correct factor be used to be consistent with the manner that they currently calculate emissions. Please change the permit as follows:

~~D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] and Emission Offset Minor Limit [326 IAC 2-3]
Pursuant to CP 089-3522-00062, issued August 11, 1995:~~

- ~~(a) The pigment produced by the pigment stripper shall be limited to 96.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Emissions from the pigment stripper shall be limited to less than 497 pounds of VOC **0.0694 tons of VOC** per ton of pigment produced.~~

...

IDEM Response to Comment 8: In order for the modifications done under CP 089-3522-00062 to be a minor modification under PSD, the Permittee accepted limits such that emissions of VOC from this facility would be less than 25 tons per year. The limit in Condition D.2.1(a), as written, limits VOC emissions from the pigment production processes to less than 25 tons per year. The Permittee has pointed out that the emission factor, as determined by technical analysis during the permitting process, are far less than those stated in the limit. The permit has been changed as follows:

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] and Emission Offset Minor Limit [326 IAC 2-3]
Pursuant to CP 089-3522-00062, issued August 11, 1995 **and as revised in T089-18134-00062:**

- (a) The pigment produced by the pigment stripper shall be limited to ~~96.5~~ **360** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Emissions from the pigment stripper shall be limited to less than ~~497 pounds~~ **0.0694 tons** of VOC per ton of pigment produced.

...

Comment 9: The *County Attainment Status* section of the Technical Support Document states that Avery Dennison is a major source under 326 IAC 2-7 because VOC emissions are greater than 25 tons per year. The 25 tons per year was the limit when Lake County was designated as severe non-attainment for the 1-hr ozone standard. Lake County is now designated as moderate non-attainment for the 8-hr ozone standard and 100 tons per year is the appropriate VOC limit to make a source major under 326 IAC 2-7.

IDEM Response to Comment 9: As stated in paragraph (b)(1) of the *County Attainment Status* section of the Technical Support Document, "On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation." Therefore, the applicability threshold is still 25 tons per year for VOC in Lake County.

Comment 10: The table in the *Potential to Emit After Issuance* section of the technical Support Document shows the incorrect VOC emissions for C-11. Please correct the table to show that VOC emissions for Press C-11 are 21.94 tons per year.

IDEM Response to Comment 10: The PTE value for press C-11 in the *Potential to Emit After Issuance* section of the Technical Support Document should read 30.17 tons per year. (See IDEM Response to Comment 3 above.) No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 11: The Myers Mixer and Emission Unit 715 are the same unit. When the application for a permit modification was submitted to permit the Myers Mixer, the unit was identified as Unit 715. During the Title V Renewal process, Avery Dennison changed the nomenclature of the Myers

Mixer from Unit 715, to Unit PP-1. Please clarify the Preventative Maintenance Plan requirement for the Myers Mixer in Condition D.2.2 by removing reference to Unit 715.

IDEM Response to Comment 11: The permit has been changed as follows:

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~emission units 715 and the~~ Myers Mixer (**PP-1**) and its control devices.

Comment 12: Avery requests that the following determination on the applicability of the Organic Liquids Distribution NESHAP be added to the *Federal Rule Applicability* section of the Technical Support Document.

The storage tanks, loading rack, and containers such as totes and drums that may contain organic liquids with more than 5% HAPs are not subject to the National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline), including the requirement for an initial notification, since they are not subject to any emission limitations. There are no storage tanks at the facility that exceed 5,000 gallons, nor are there any loading racks that load organic liquids. Loading is defined in the rule as liquid loaded for transport within or out of the facility through transfer racks that are part of the affected source into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources). Therefore, Avery is only required to maintain documentation of the sizes of their tanks to verify that the volumes of the tanks do not exceed 5,000 gallons and that no loading activities occur at the facility. There is no capacity limit that would require controls at an existing affected source that only unloads organic liquids.

IDEM Response to Comment 12: The Permittee is incorrect in stating that the storage tanks and associated equipment for liquid transfer are not subject to the National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline) (40 CFR 63, Subpart EEEE) which is incorporated by reference in 326 IAC 20-83. The fifteen (15) volatile organic liquid storage tanks and the associated liquid transfer equipment are considered organic liquid distribution (OLD) operations under this NESHAP because they are the collection of activities and equipment used to distribute organic liquids into, out of, or within a facility as defined in 40 CFR 63.2406. In addition, this source is an existing major source of HAP. Pursuant to 40 CFR 63.2334(a), the fifteen (15) volatile organic liquid storage tanks and the associated liquid transfer equipment are affected units under the NESHAP, Subpart EEEE. However, since the maximum capacity of each storage tank is less than 5,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons, there are no specific emission limitations applicable to these affected units under this NESHAP. The affected units at this source are subject to the following provisions of Subpart EEEE:

- (A) 40 CFR 63.2334(a)
- (B) 40 CFR 63.2338(a), (b), (c)(1) - (3), (f)
- (C) 40 CFR 63.2342(b)(1), (d)
- (D) 40 CFR 63.2343(a), (c), (d)
- (E) 40 CFR 63.2382(a), (b)(1)
- (F) 40 CFR 63.2386(a), (c)(1) - (3), (d)(3)(ii)
- (G) 40 CFR 63.2390(a), (d)
- (H) 40 CFR 63.2394
- (I) 40 CFR 63.2398
- (J) 40 CFR 63.2402
- (K) 40 CFR 63.2406

The permit has been changed as follows:

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

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

...

- (g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.**

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr consisting of one (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 MMBtu/hr [326 IAC 6-2-4]
- (b) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:
 - ~~(1) Fifteen (15) volatile organic liquid storage tanks, each with a maximum storage capacity of 3,000 gallons. [326 IAC 8-9]~~
 - (7) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons [326 IAC 8-9].
 - (8) Degreasing operations not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.**

Insignificant Activity:

- (b) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than

five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:

- (1) ~~Fifteen (15) volatile organic liquid storage tanks, each with a maximum storage capacity of 3,000 gallons. [326 IAC 8-9]~~
- (7) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons [326 IAC 8-9].

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

SECTION E.2 FACILITY OPERATION CONDITIONS

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

- (g) **Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons. Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.**

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Organic Liquids Distribution (Non-Gasoline) [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to NESHAP Subpart EEEE (National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline) [326 IAC 20-1] [40 CFR Part 63, Subpart A])

- (a) Pursuant to 40 CFR 63.823, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 as specified in Table 12 of 40 CFR Part 63, Subpart EEEE in accordance with schedule in 40 CFR 63 Subpart EEEE.

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

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

E.2.2 NESHAP Subpart EEEE Requirements [40 CFR 63, Subpart EEEE]

Pursuant to 40 CFR 63, Subpart EEEE, the fifteen (15) volatile organic liquid storage tanks and the associated loading equipment shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE, (included as Attachment B of this permit):

- (A) 40 CFR 63.2334(a)
- (B) 40 CFR 63.2338(a), (b), (c)(1 - (3)), (f)

- (C) 40 CFR 63.2342(b)(1), (d)
- (D) 40 CFR 63.2343(a), (d)
- (E) 40 CFR 63.2382(a), (b)(1)
- (F) 40 CFR 63.2386(a), (c)(1) - (3), (d)(3)(i), (d)(93)(ii), (d)(4)(i)
- (G) 40 CFR 63.2390(a), (d)
- (H) 40 CFR 63.2394(a), (b), (c)
- (I) 40 CFR 63.2398
- (J) 40 CFR 63.2402
- (K) 40 CFR 63.2006

(This is a separate attachment to the permit.)

Attachment B, NESHAP Subpart EEEE

**Avery Dennison PFD
650 West 67th Avenue
Scherverville, Indiana 46375**

Permit No.: 089-18134-00062

National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline)

40 CFR 63.2334 Am I subject to this subpart?

(a) Except as provided for in paragraphs (b) and (c) of this section, you are subject to this subpart if you own or operate an OLD operation that is located at, or is part of, a major source of HAP emissions. An OLD operation may occupy an entire plant site or be collocated with other industrial (e.g., manufacturing) operations at the same plant site.

40 CFR 63.2338 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, or existing OLD operation affected source.

(b) Except as provided in paragraph (c) of this section, the affected source is the collection of activities and equipment used to distribute organic liquids into, out of, or within a facility that is a major source of HAP. The affected source is composed of:

(1) All storage tanks storing organic liquids.

(2) All transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers.

(3) All equipment leak components in organic liquids service that are associated with:

(i) Storage tanks storing organic liquids;

(ii) Transfer racks loading or unloading organic liquids;

(iii) Pipelines that transfer organic liquids directly between two storage tanks that are subject to this subpart;

(iv) Pipelines that transfer organic liquids directly between a storage tank subject to this subpart and a transfer rack subject to this subpart; and

(v) Pipelines that transfer organic liquids directly between two transfer racks that are subject to this subpart.

(4) All transport vehicles while they are loading or unloading organic liquids at transfer racks subject to this subpart.

(5) All containers while they are loading or unloading organic liquids at transfer racks subject to this subpart.

(c) The equipment listed in paragraphs (c)(1) through (4) of this section and used in the identified operations is excluded from the affected source.

(1) Storage tanks, transfer racks, transport vehicles, containers, and equipment leak components that are part of an affected source under another 40 CFR part 63 national emission standards for hazardous air pollutants (NESHAP).

(2) Non-permanent storage tanks, transfer racks, transport vehicles, containers, and equipment leak components when used in special situation distribution loading and unloading operations (such as maintenance or upset liquids management).

(3) Storage tanks, transfer racks, transport vehicles, containers, and equipment leak components when used to conduct maintenance activities, such as stormwater management, liquid removal from tanks for inspections and maintenance, or changeovers to a different liquid stored in a storage tank.

(f) An affected source is existing if it is not new or reconstructed.

40 CFR 63.2342 When do I have to comply with this subpart?

(b)(1) If you have an existing affected source, you must comply with the emission limitations, operating limits, and work practice standards for existing affected sources no later than February 5, 2007, except as provided in paragraphs (b)(2) and (3) of this section.

(d) You must meet the notification requirements in 40 CFR 40 CFR 63.2343 and 63.2382(a), as applicable, according to the schedules in 40 CFR 63.2382(a) and (b)(1) through (3) and in subpart A of this part. Some of these notifications must be submitted before the compliance dates for the emission limitations, operating limits, and work practice standards in this subpart.

40 CFR 63.2343 What are my requirements for emission sources not requiring control?
This section establishes the notification, recordkeeping, and reporting requirements for emission sources identified in 40 CFR 63.2338 that do not require control under this subpart (i.e., under paragraphs (a) through (e) of 40 CFR 63.2346). Such emission sources are not subject to any other notification, recordkeeping, or reporting sections in this subpart, including 40 CFR 63.2350(c), except as indicated in paragraphs (a) through (d) of this section.

(a) For each storage tank subject to this subpart having a capacity of less than 18.9 cubic meters (5,000 gallons) and for each transfer rack subject to this subpart that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), you must keep documentation that verifies that each storage tank and transfer rack identified in paragraph (a) of this section is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form in a separate location. The documentation may consist of identification of the tanks and transfer racks identified in paragraph (a) of this section on a plant site plan or process and instrumentation diagram (P&ID).

(d) If one or more of the events identified in paragraphs (d)(1) through (4) of this section occur since the filing of the Notification of Compliance Status or the last Compliance report, you must submit a subsequent Compliance report as specified in paragraphs (b)(3) and (c)(3) of this section.

(1) Any storage tank or transfer rack became subject to control under this subpart EEEE; or

(2) Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of this subpart; or

(3) Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or

(4) Any of the information required in 40 CFR 63.2386(c)(1), 40 CFR 63.2386(c)(2), or 40 CFR 63.2386(c)(3) has changed.

Notifications, Reports, and Records

40 CFR 63.2382 What notifications must I submit and when and what information should be submitted?

(a) You must submit each notification in subpart SS of this part, Table 12 to this subpart, and paragraphs (b) through (d) of this section that applies to you. You must submit these notifications according to the schedule in Table 12 to this subpart and as specified in paragraphs (b) through (d) of this section.

(b)(1) Initial Notification. If you startup your affected source before February 3, 2004, you must submit the Initial Notification no later than 120 calendar days after February 3, 2004.

40 CFR 63.2386 What reports must I submit and when and what information is to be submitted in each?

(a) You must submit each report in subpart SS of this part, Table 11 to this subpart, Table 12 to this subpart, and in paragraphs (c) through (e) of this section that applies to you.

(c) First Compliance report. The first Compliance report must contain the information specified in paragraphs (c)(1) through (10) of this section.

(1) Company name and address.

(2) Statement by a responsible official, including the official's name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

(3) Date of report and beginning and ending dates of the reporting period.

(d) Subsequent Compliance reports. Subsequent Compliance reports must contain the information in paragraphs (c)(1) through (9) of this section and, where applicable, the information in paragraphs (d)(1) through (4) of this section.

(3)(i) A listing of any storage tank that became subject to controls based on the criteria for control specified in table 2 to this subpart, items 1 through 6, since the filing of the last Compliance report.

(ii) A listing of any transfer rack that became subject to controls based on the criteria for control specified in table 2 to this subpart, items 7 through 10, since the filing of the last Compliance report.

(4)(i) A listing of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of this subpart, since the last Compliance report.

40 CFR 63.2390 What records must I keep?

(a) For each emission source identified in 40 CFR 63.2338 that does not require control under this subpart, you must keep all records identified in 40 CFR 63.2343.

(d) You must keep records of the total actual annual facility-level organic liquid loading volume as defined in 40 CFR 63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in table 2 to this subpart, items 7 through 10.

40 CFR 63.2394 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form at a separate location.

(b) As specified in 40 CFR 63.10(b)(1), you must keep your files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). You may keep the records off site for the remaining 3 years.

40 CFR 63.2398 What parts of the General Provisions apply to me?

Table 12 to this subpart shows which parts of the General Provisions in 40 CFR 40 CFR 63.1 through 63.15 apply to you.

40 CFR 63.2402 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. Environmental Protection Agency (U.S. EPA) or a delegated authority such as your State, local, or eligible tribal agency. If the EPA Administrator has delegated authority to your State, local, or eligible tribal agency, then that agency, as well as the EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office (see list in 40 CFR 63.13) to find out if this subpart is delegated to your State, local, or eligible tribal agency.

(b) In delegating implementation and enforcement authority for this subpart to a State, local, or eligible tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraphs (b)(1) through (4) of this section are retained by the EPA Administrator and are not delegated to the State, local, or eligible tribal agency.

(1) Approval of alternatives to the nonopacity emission limitations, operating limits, and work practice standards in 40 CFR 63.2346(a) through (c) under 40 CFR 63.6(g).

(2) Approval of major changes to test methods under 40 CFR 63.7(e)(2)(ii) and (f) and as defined in 40 CFR 63.90.

(3) Approval of major changes to monitoring under 40 CFR 63.8(f) and as defined in 40 CFR 63.90.

(4) Approval of major changes to recordkeeping and reporting under 40 CFR 63.10(f) and as defined in 40 CFR 63.90.

40 CFR 63.2406 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, 40 CFR part 63, subparts H, PP, SS, TT, UU, and WW, and in this section. If the same term is defined in another subpart and in this section, it will have the meaning given in this section for purposes of this subpart.

Notwithstanding the introductory language in 40 CFR 63.921, the terms “container” and “safety device” shall have the meaning found in this subpart and not in 40 CFR 63.921.

Actual annual average temperature, for organic liquids, means the temperature determined using the following methods:

(1) For heated or cooled storage tanks, use the calculated annual average temperature of the stored organic liquid as determined from a design analysis of the storage tank.

(2) For ambient temperature storage tanks:

(i) Use the annual average of the local (nearest) normal daily mean temperatures reported by the National Climatic Data Center; or

(ii) Use any other method that the EPA approves.

Annual average true vapor pressure means the equilibrium partial pressure exerted by the total table 1 organic HAP in the stored or transferred organic liquid. For the purpose of determining if a liquid meets the definition of an organic liquid, the vapor pressure is determined using standard conditions of 77 degrees F and 29.92 inches of mercury. For the purpose of determining whether an organic liquid meets the applicability criteria in table 2, items 1 through 6, to this subpart, use the actual annual average temperature as defined in this subpart. The vapor pressure value in either of these cases is determined:

(1) In accordance with methods described in American Petroleum Institute Publication 2517, Evaporative Loss from External Floating-Roof Tanks (incorporated by reference, see 40 CFR 63.14);

(2) Using standard reference texts;

(3) By the American Society for Testing and Materials Method D2879–83, 96 (incorporated by reference, see 40 CFR 63.14); or

(4) Using any other method that the EPA approves.

Bottoms receiver means a tank that collects distillation bottoms before the stream is sent for storage or for further processing downstream.

Cargo tank means a liquid-carrying tank permanently attached and forming an integral part of a motor vehicle or truck trailer. This term also refers to the entire cargo tank motor vehicle or trailer. For the purpose of this subpart, vacuum trucks used exclusively for maintenance or spill response are not considered cargo tanks.

Closed vent system means a system that is not open to the atmosphere and is composed of piping, ductwork, connections, and, if necessary, flow-inducing devices that transport gas or vapors from an emission point to a control device. This system does not include the vapor collection system that is part of some transport vehicles or the loading arm or hose that is used for vapor return. For transfer racks, the closed vent system begins at, and includes, the first block valve on the downstream side of the loading arm or hose used to convey displaced vapors.

Combustion device means an individual unit of equipment, such as a flare, oxidizer, catalytic oxidizer, process heater, or boiler, used for the combustion of organic emissions.

Container means a portable unit in which a material can be stored, transported, treated, disposed of, or otherwise handled. Examples of containers include, but are not limited to, drums and portable cargo containers known as “portable tanks” or “totes.”

Control device means any combustion device, recovery device, recapture device, or any combination of these devices used to comply with this subpart. Such equipment or devices include, but are not limited to, absorbers, adsorbers, condensers, and combustion devices. Primary condensers, steam strippers, and fuel gas systems are not considered control devices.

Crude oil means any of the naturally occurring liquids commonly referred to as crude oil, regardless of specific physical properties. Only those crude oils downstream of the first point of custody transfer after the production field are considered crude oils in this subpart.

Custody transfer means the transfer of hydrocarbon liquids after processing and/or treatment in the producing operations, or from storage tanks or automatic transfer facilities to pipelines or any other forms of transportation.

Design evaluation means a procedure for evaluating control devices that complies with the requirements in 40 CFR 63.985(b)(1)(i).

Deviation means any instance in which an affected source subject to this subpart, or portion thereof, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;**
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart, and that is included in the operating permit for any affected source required to obtain such a permit; or**
- (3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during SSM.**

Emission limitation means an emission limit, opacity limit, operating limit, or visible emission limit.

Equipment leak component means each pump, valve, and sampling connection system used in organic liquids service at an OLD operation. Valve types include control, globe, gate, plug, and ball. Relief and check valves are excluded.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals (4.0 pounds per square inch absolute (psia)) or greater which is used as a fuel for internal combustion engines. Aviation gasoline is included in this definition.

High throughput transfer rack means those transfer racks that transfer into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) a total of 11.8 million liters per year or greater of organic liquids.

In organic liquids service means that an equipment leak component contains or contacts organic liquids having 5 percent by weight or greater of the organic HAP listed in Table 1 to this subpart.

Low throughput transfer rack means those transfer racks that transfer into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) less than 11.8 million liters per year of organic liquids.

On-site or on site means, with respect to records required to be maintained by this subpart or required by another subpart referenced by this subpart, that records are stored at a location within a major source which encompasses the affected source. On-site includes, but is not limited to, storage at the affected source to which the records pertain, storage in central files elsewhere at the major source, or electronically available at the site.

Organic liquid means:

(1) Any non-crude oil liquid or liquid mixture that contains 5 percent by weight or greater of the organic HAP listed in Table 1 to this subpart, as determined using the procedures specified in 40 CFR 63.2354(c).

(2) Any crude oils downstream of the first point of custody transfer.

(3) Organic liquids for purposes of this subpart do not include the following liquids:

(i) Gasoline (including aviation gasoline), kerosene (No. 1 distillate oil), diesel (No. 2 distillate oil), asphalt, and heavier distillate oils and fuel oils;

(ii) Any fuel consumed or dispensed on the plant site directly to users (such as fuels for fleet refueling or for refueling marine vessels that support the operation of the plant);

(iii) Hazardous waste;

(iv) Wastewater;

(v) Ballast water: or

(vi) Any non-crude oil liquid with an annual average true vapor pressure less than 0.7 kilopascals (0.1 psia).

Organic liquids distribution (OLD) operation means the combination of activities and equipment used to store or transfer organic liquids into, out of, or within a plant site regardless of the specific activity being performed. Activities include, but are not limited to, storage, transfer, blending, compounding, and packaging.

Permitting authority means one of the following:

(1) The State Air Pollution Control Agency, local agency, or other agency authorized by the EPA Administrator to carry out a permit program under 40 CFR part 70; or

(2) The EPA Administrator, in the case of EPA-implemented permit programs under title V of the CAA (42 U.S.C. 7661) and 40 CFR part 71.

Plant site means all contiguous or adjoining surface property that is under common control, including surface properties that are separated only by a road or other public right-of-way. Common control includes surface properties that are owned, leased, or operated by the same entity, parent entity, subsidiary, or any combination.

Research and development facility means laboratory and pilot plant operations whose primary purpose is to conduct research and development into new processes and products, where the

operations are under the close supervision of technically trained personnel, and which are not engaged in the manufacture of products for commercial sale, except in a de minimis manner.

Responsible official means responsible official as defined in 40 CFR 70.2 and 40 CFR 71.2, as applicable.

Safety device means a closure device such as a pressure relief valve, frangible disc, fusible plug, or any other type of device that functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned, accidental, or emergency event.

Shutdown means the cessation of operation of an OLD affected source, or portion thereof (other than as part of normal operation of a batch-type operation), including equipment required or used to comply with this subpart, or the emptying and degassing of a storage tank. Shutdown as defined here includes, but is not limited to, events that result from periodic maintenance, replacement of equipment, or repair.

Startup means the setting in operation of an OLD affected source, or portion thereof (other than as part of normal operation of a batch-type operation), for any purpose. Startup also includes the placing in operation of any individual piece of equipment required or used to comply with this subpart including, but not limited to, control devices and monitors.

Storage tank means a stationary unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, or reinforced plastic) that provide structural support and is designed to hold a bulk quantity of liquid. Storage tanks do not include:

- (1) Units permanently attached to conveyances such as trucks, trailers, rail cars, barges, or ships;**
- (2) Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere;**
- (3) Bottoms receivers;**
- (4) Surge control vessels;**
- (5) Vessels storing wastewater; or**
- (6) Reactor vessels associated with a manufacturing process unit.**

Surge control vessel means feed drums, recycle drums, and intermediate vessels. Surge control vessels are used within chemical manufacturing processes when in-process storage, mixing, or management of flow rates or volumes is needed to assist in production of a product.

Tank car means a car designed to carry liquid freight by rail, and including a permanently attached tank.

Total actual annual facility-level organic liquid loading volume means the total facility-level actual volume of organic liquid loaded for transport within or out of the facility through transfer racks that are part of the affected source into transport vehicles (for existing affected sources) or into transport vehicles and containers (for new affected sources) based on a 3-year rolling average, calculated annually.

- (1) For existing affected sources, each 3-year rolling average is based on actual facility-level loading volume during each calendar year (January 1 through December 31) in the 3-year period. For calendar year 2004 only (the first year of the initial 3-year rolling average), if an owner or**

operator of an affected source does not have actual loading volume data for the time period from January 1, 2004, through February 2, 2004 (the time period prior to the effective date of the OLD NESHAP), the owner or operator shall compute a facility-level loading volume for this time period as follows: At the end of the 2004 calendar year, the owner or operator shall calculate a daily average facility-level loading volume (based on the actual loading volume for February 3, 2004, through December 31, 2004) and use that daily average to estimate the facility-level loading volume for the period of time from January 1, 2004, through February 2, 2004. The owner or operator shall then sum the estimated facility-level loading volume from January 1, 2004, through February 2, 2004, and the actual facility-level loading volume from February 3, 2004, through December 31, 2004, to calculate the annual facility-level loading volume for calendar year 2004.

(2)(i) For new affected sources, the 3-year rolling average is calculated as an average of three 12-month periods. An owner or operator must select as the beginning calculation date with which to start the calculations as either the initial startup date of the new affected source or the first day of the calendar month following the month in which startup occurs. Once selected, the date with which the calculations begin cannot be changed.

(ii) The initial 3-year rolling average is based on the projected maximum facility-level annual loading volume for each of the 3 years following the selected beginning calculation date. The second 3-year rolling average is based on actual facility-level loading volume for the first year of operation plus a new projected maximum facility-level annual loading volume for second and third years following the selected beginning calculation date. The third 3-year rolling average is based on actual facility-level loading volume for the first 2 years of operation plus a new projected maximum annual facility-level loading volume for the third year following the beginning calculation date. Subsequent 3-year rolling averages are based on actual facility-level loading volume for each year in the 3-year rolling average.

Transfer rack means a single system used to load organic liquids into, or unload organic liquids out of, transport vehicles or containers. It includes all loading and unloading arms, pumps, meters, shutoff valves, relief valves, and other piping and equipment necessary for the transfer operation. Transfer equipment and operations that are physically separate (i.e., do not share common piping, valves, and other equipment) are considered to be separate transfer racks.

Transport vehicle means a cargo tank or tank car.

Vapor balancing system means:

(1) A piping system that collects organic HAP vapors displaced from transport vehicles or containers during loading and routes the collected vapors to the storage tank from which the liquid being loaded originated or to another storage tank connected to a common header. For containers, the piping system must route the displaced vapors directly to the appropriate storage tank or to another storage tank connected to a common header in order to qualify as a vapor balancing system; or

(2) A piping system that collects organic HAP vapors displaced from the loading of a storage tank and routes the collected vapors to the transport vehicle from which the storage tank is filled.

Vapor collection system means any equipment located at the source (i.e., at the OLD operation) that is not open to the atmosphere; that is composed of piping, connections, and, if necessary, flow-inducing devices; and that is used for:

(1) Containing and conveying vapors displaced during the loading of transport vehicles to a control device;

(2) Containing and directly conveying vapors displaced during the loading of containers; or

(3) Vapor balancing. This does not include any of the vapor collection equipment that is installed on the transport vehicle.

Vapor-tight transport vehicle means a transport vehicle that has been demonstrated to be vapor-tight. To be considered vapor-tight, a transport vehicle equipped with vapor collection equipment must undergo a pressure change of no more than 250 pascals (1 inch of water) within 5 minutes after it is pressurized to 4,500 pascals (18 inches of water). This capability must be demonstrated annually using the procedures specified in EPA Method 27 of 40 CFR part 60, appendix A. For all other transport vehicles, vapor tightness is demonstrated by performing the U.S. DOT pressure test procedures for tank cars and cargo tanks.

Work practice standard means any design, equipment, work practice, or operational standard, or combination thereof, that is promulgated pursuant to section 112(h) of the CAA.

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	Avery Dennison PFD
Source Location:	650 West 67 th Avenue, Schererville, Indiana 46375-1390
County:	Lake
SIC Code:	2754, 2816
Operation Permit No.:	089-7441-00062
Operation Permit Issuance Date:	July 16, 1999
Permit Renewal No.:	089-18134-00062
Permit Writer:	ERG/ST

The Office of Air Quality has reviewed a Part 70 Operating Permit Renewal application from Avery Dennison PFD relating to the operation of a stationary commercial gravure printing and pigment and lacquer manufacturing operation.

History

On October 7, 2003, Avery Dennison submitted an application to the OAQ requesting the renewal of its Part 70 operating permit (T089-7441-00062, issued on July 16, 1999) and incorporation of the new emission units approved for construction under the Second Significant Source Modification 089-23352-00062, issued February 27, 2007.

On April 25, 2000, Avery Dennison PFD was issued a Significant Source Modification for the construction of two new rotogravure presses (identified as presses C-9 and C-11). These two emission units received limits to remain minor for 326 IAC 2-3 Emission Offsets. However, only press C-9 was constructed. Avery Dennison submitted an application for a Second Significant Source Modification to add another rotogravure press (identified as C-11) in 2006. The Second Significant Source Modification (SSM 089-23352-00062) was issued to Avery Dennison on February 27, 2007. In addition to approving the construction of the new rotogravure press (C-11), this SSM also revised the descriptions of the lacquer production area. Based on telephone conversations with Avery Dennison, mill 702 and mixers 7441 and 710 were inadvertently left out from the emission unit list in the source modification and mill 803 should have been replaced by a new mill identified as 703. These issues have been revised in this draft.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks C-7A and C-7B respectively. Under 40 CFR 63, Subpart KK, these are considered as three (3) existing packaging rotogravure printing presses.
- (b) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.

- (c) One (1) three-station coater packaging rotogravure printing press, installed in 2001 and identified as C-9, which has a maximum line speed of 1,500 feet per minute (ft/min), and a maximum printing width of 71 inches controlled by one (1) 15.8 MMBtu/hr thermal oxidizer exhausting to one (1) stack C-9. Under 40 CFR 63, Subpart KK, this is considered as an existing packaging rotogravure printing press.
- (d) One (1) eight station coater packaging rotogravure printing press, identified as C-11, constructed in 2007, which has a maximum line speed of 300 ft/min, and a maximum printing width of 39 inches. Emissions will be controlled by one (1) 3.35 MMBtu/hr thermal oxidizer, identified as C-11. The press is also attached to a 7 MMBtu/hr natural gas fired energy recovery heat unit. Under 40 CFR 63, Subpart KK, this is considered as a new packaging rotogravure printing press.
- (e) One (1) lacquer production area, consisting of the following equipment:
 - (1) Two (2) Schold mixers, installed in 1974, identified as 700 and 701, each with maximum capacity of thirty (30) horsepower.
 - (2) One (1) KD mill, installed in 1974 and identified as 702, with a maximum capacity of 75 horsepower.
 - (3) One (1) KD mill, installed in 1993 and replaced in 2002, identified as 703, with a maximum capacity of 75 horsepower.
 - (4) One (1) Schold mixer, installed in 1979 and replaced in 1993, identified as 709, with maximum capacity of fifteen (15) horsepower.
 - (5) One (1) ER mixer, installed in 1993, identified as 710, with a maximum capacity of ten (10) horsepower.
 - (6) One (1) Schold mixer, installed in 1993, identified as 711, with a maximum capacity of thirty (30) horsepower.
 - (7) Two (2) Schold mixers, installed in 1979 and replaced in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower.
 - (8) One (1) sandmill, installed in 1993, identified as 802.
 - (9) Two (2) Schold mixers, installed in 1993, each with maximum capacity of thirty (30) horsepower.
 - (10) One (1) GM Mixer.
- (f) One (1) pigment production area, consisting of the following equipment:
 - (1) One (1) Hockmeyer mixer, identified as PP-2, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.
 - (3) One (1) stripper tub, one (1) homogenizer tub, one (1) spent acetone tank, one (1) product tank, and two (2) sludge tanks.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr consisting of one (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 MMBtu/hr. [326 IAC 6-2-4]

- (b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:
- (1) Fifteen (15) volatile organic liquid storage tanks, each with a maximum storage capacity of 3,000 gallons. [326 IAC 8-9]
 - (2) Three (3) Proof Presses.
 - (3) C7 Pan and roll cleaning.
 - (4) C8 Pan and roll cleaning.
 - (5) Wash Tech Cleaning Unit.
 - (6) C9 Pan and roll cleaning.
 - (7) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons [326 IAC 8-9].
 - (8) Degreasing operations not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) Paved roads and parking lots. [326 IAC 6-4]
- (d) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 2 Kpa, 15mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 Kpa, 5mmHg, or 0.1psi measured at 20 degrees C (68 degrees F);
- Which for all cleaners and solvents combined does not exceed 145 per 12 months;
- (e) Operations using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) A laboratory as defined in 326 IAC 2-7-1(21)(C).

Emission Units Removed from the Source

No units have been removed from service since the issuance of SSM 089-23352-00062.

Existing Approvals

The source was issued a Part 70 Operating Permit 089-7441-00062 on July 16, 1999. The source has since received the following approvals:

- (a) Significant Source Modification No. 089-11272-00062 issued on April 25, 2000;
- (b) Administrative Amendment No. 089-11408-00062 issued on April 25, 2000;
- (c) First Permit Reopening 089-13359-00062 issued on November 1, 2001;

- (d) Exemption No. 089-21933-00062 issued on November 15, 2005; and
- (e) Second Significant Source Modification No. 089-23352-00062 issued on February 27, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation program have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issues

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C-7A	Press C-7, C-10 and Texmac	40	3.2	7,985	515
C-7B	Press C-7, C-10 and Texmac	40	4.38	35,416	1,316
C-8	Press C-8	50	3.77	37,078	684
C-9	Press C-9	40	6	39,678	640
C-11	Press C-11	40	3	36,550	800 to 850

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Maintenance Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Unclassifiable/Attainment
8-Hour Ozone	Moderate Nonattainment
CO	Maintenance Attainment
Lead	Unclassifiable/Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Lake County to attainment for the sulfur dioxide standard.

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone.

- (1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

- (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Lake County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	PTE (tons/year)
PM	1.4
PM-10	2.0
SO ₂	0.10
VOC	>250
CO	22.6
NO _x	21.2
Toluene	> 10
Methyl Isobutyl Ketone (MIBK)	>10
2- Nitro Propane (Nipar)	>10
Total HAPs	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the year 2004 OAQ emission data.

Actual Emissions of the Entire Source	
Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	1.0
SO ₂	0.08
VOC	16
CO	12
NO _x	14
HAP	Not Reported

Part 70 Permit Conditions

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

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

The source was issued a Part 70 Operating Permit on July 16, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission. Any control equipment is considered federally enforceable only after issuance of the original Part 70 operation permit and to the extent that the effect of the control equipment is made practically enforceable in the permit.

Potential to Emit (tons/year)								
Process/Emission Unit	PM	PM10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Press C - 7, w/ oxidizer	1.20	1.20	0.10	21.1 ^a	13.0	15.5	-	-
Press C - 8, w/ oxidizer				19.3 ^a				
Press C - 10, w/ oxidizer				19.3 ^a				
Texmac Surface Coater	-	-	-	2.7 ^a	-	-	0.66	1.49
Lacquer Production Line	-	-	-	24.06 ^a	-	-	5.34	12.96
Pigment Production Line	-	-	-	23.80 ^a	-	-	0.45	0.76
Tank Farm	-	-	-	4.2 ^a	-	-	1.12	3.36
Press C-9	-	-	-	19.00 ^b	-	-	0.85	0.85
Press C-11	-	-	-	30.0 ^c	-	-	8.98	10.49
Hockmeyer Mixer (PP - 2)	-	-	-	9.6 ^{c, d}	-	-	-	-
Myers Mixer (M 715)	-	-	-	0.03 ^{c, d}	-	-	-	-
N. G. Combustion C-9 & C-11	0.90	0.90	0.10	0.60	1.60	5.70	0.20	0.20
Total from the Source	2.10	2.10	0.20	174	14.6	21.20	17.6	30.1

^a These figures are taken from the TSD for CP 089-3522-00062, issued May 23, 1995.

^b Limited as shown in permit # 089-11272-00062, issued April 25, 2000.

^c Limited as shown in permit # 089-23352-00062, issued February 27, 2007.

^d The Hockmeyer and Myers mixers are also limited by the limit of 23.80 tons per year on all pigment production facilities.

- (a) This existing stationary source is major for 326 IAC 2-3 (Emission Offset) because the emissions of the volatile organic compounds (VOC) are greater than 25 tons per year.
- (d) This existing stationary source is not a major source under 326 IAC 2-2 (Prevention of Significant Deterioration) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the twenty-eight (28) listed source categories specified in 326 IAC 2-2-1(gg)(1).
- (f) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) Compliance Assurance Monitoring (CAM) 40 CFR Part 64:

This source has pollutant-specific emission units as defined in 40 CFR 64.1 for VOC and HAPs:

- (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and HAPs,
- (2) that is subject to an emission limitation or standard for VOC and HAPs and
- (3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each emission unit:

CAM Applicability							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE(tons /year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Press C-10 (VOC)	Thermal Oxidizer	Y	2210	21.94	100	Y	N
Press C- 10 (HAPs)	Thermal Oxidizer	Y	1054	15.5	10 / 25	N	N
Press C-9 (VOC)	Thermal Oxidizer	Y	4451	19.0	100	Y	N
Press C- 9 (HAPs)	Thermal Oxidizer	Y	56.7	0.85	10 / 25	N	N
Press C-8 (VOC)	Thermal Oxidizer	Y	2210	21.94	100	Y	N
Press C- 8 (HAPs)	Thermal Oxidizer	Y	1054	15.5	10 / 25	N	N
Press C-7 (VOC)	Thermal Oxidizer	Y	2210	21.94	100	Y	N
Press C- 7 (HAPs)	Thermal Oxidizer	Y	1054	15.5	10 / 25	N	N
Texmac Surface Coater (VOC)	Thermal Oxidizer	Y	180	2.7	100	Y	N
Texmac Surface Coater (HAPs)	Thermal Oxidizer	Y	99.3	1.49	10 / 25	N	N
Press C-11 (VOC)	Thermal Oxidizer	Y	2210	30.0	100	Y	N
Press C- 11 (HAPs)	Thermal Oxidizer	Y	1054	15.5	10 / 25	N	N

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to rotogravure printing presses identified as C-7, C-8, C-9, C-10, C-11 and Texmac. These emission units are not large pollutant-specific emission units because the potential to emit VOC emission after controls, for each is less than the major source level of one hundred (100) tons per year. The CAM requirements for VOC emissions for the printing presses are discussed in the compliance requirements section of this TSD.

However, the requirements of 40 CFR 64, CAM are not applicable to the printing presses identified as C-7, C-8, C-9, C-10, C-11 and Texmac for HAP emissions because pursuant to 40 CFR 64.2(b)(1)(i), emission units subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP), which is a standard under section 112 of the Clean Air Act (CAA), are exempt from the requirements of this rule. Since these printing operations are subject to the requirements of the NESHAP, 40 CFR 63.820, Subpart KK, which regulates HAP emissions, it is not subject to 40 CFR 64, CAM.

(b) New Source Performance Standards (NSPS) 40 CFR Part 60:

- (1) The boiler is not subject to the provisions 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because it was constructed prior to June 9, 1989 and has a heat input capacity less than 100 MMBtu per hour
- (2) The storage tanks are not subject to the provisions of 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12) because the storage capacity of each tank is less than

45 cubic meters (19,813 gallons).

- (3) The storage tanks are not subject to the provisions of 40 CFR 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (326 IAC 12) or 40 CFR 60, Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 (326 IAC 12) because the storage capacity of each tank is less than 40,000 gallons.
 - (4) Packaging rotogravure printing presses, identified as C-7, C-8, C-9, C-10, C-11, and Texmac are not subject to the requirements of the New Source Performance Standard for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60.430, Subpart QQ because these emission units are packaging rotogravure printing presses and not publication rotogravure presses.
 - (5) Packaging rotogravure printing presses, identified as C-7, C-8, C-9, C-10, C-11, and Texmac are not subject to the requirements of the New Source Performance Standard for Pressure Sensitive Tapes and Label Surface Coating Operations, 40 CFR 60.440, Subpart RR because the products surface coated at the presses are not pressure sensitive tapes and labels.
 - (6) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63:
- (1) Packaging rotogravure printing presses, identified as C-7, C-8, C-9, C-10, C-11, and Texmac are subject to the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR 63.820, Subpart KK), which is incorporated by reference in 326 IAC 20-18. This NESHAP is applicable to each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. The presses identified above are located at a Major Source as defined in 40 CFR 63.2. Nonapplicable portions of the NESHAP will not be included in the permit. This printing presses are subject to the following portions of Subpart KK:
 - (A) 40 CFR 63.820 Applicability.
 - (B) 40 CFR 63.821 Designation of affected sources.
 - (C) 40 CFR 63.823 Standards: General.
 - (D) 40 CFR 63.825 Standards: Product and packaging rotogravure.
 - (E) 40 CFR 63.826 Compliance dates.
 - (F) 40 CFR 63.827 Performance test methods.
 - (G) 40 CFR 63.828 Monitoring requirements.
 - (H) 40 CFR 63.829 Recordkeeping requirements.
 - (I) 40 CFR 63, Subpart KK, Table 1
- The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart KK.
- (3) The degreasing operations (listed as Insignificant Activities) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Solvent Halogenated Cleaning (40 CFR 63.460, Subpart T) (326 IAC 20-6), because they do not use carbon tetrachloride, chloroform, perchloroethylene, trichloroethylene and 1,1,1-trichloroethane as solvents for degreasing.
 - (4) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20 and 40 CFR Parts 61 and 63) included in this permit for this source.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on December 10, 1996 with the Part 70 Permit Application.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

This source is located in Lake County, which is designated as attainment for PM₁₀, SO₂, NO_x, CO and Lead. This source was initially constructed in 1972. Mill 702 and Press C - 7 were constructed in 1974 and have a combined PTE of VOC before controls of 320 tons per year. Several modifications have been made since 1977, when the PSD regulations came into effect.

VOC and NOx Emissions: 1-hour ozone and 8-hour ozone standards:

The following table shows each significant emission unit added since 1977, the year of construction and the increase in PTE of VOC. There were no increases in NO_x emissions for these processes.

Year Constructed (Replaced)	EU ID	Description	PTE Before Controls (tons/yr)	PTE After Controls (tons/yr)
1974	700	Mixer (Lacquer)	6.31	4.34 ^b
1974	701	Mixer (Lacquer)	6.31	4.34 ^b
1974	702	Sandmill (Lacquer)	0.35	0.24 ^b
1979 (1993)	709	Mixer (Lacquer)	0.64	0.44 ^b
1979 (1993)	713	Mixer (Lacquer)	3.09	2.18 ^b
1979 (1993)	714	Mixer (Lacquer)	3.09	2.18 ^b
1985	C-8	Press	471	19.3 ^a
1985	C-10	Press	288	19.3 ^a
1985	Bucket Wash	Bucket Wash	141.4	9.9 ^a
1985		Haz. Waste Storage Tank	less than 1	less than 1
1991	Tank Farm	Storage tanks	4.2	4.2 ^a
1993	710	Mixer (Lacquer)	7.88	5.42 ^b
1993	711	Mixer (Lacquer)	2.43	1.67 ^b
1993	802	Sandmill (Lacquer)	0.35	0.24 ^b
1993 (2002)	703	Sandmill (Lacquer)	0.35	0.24 ^b
1995	Texmac	Press	180	2.7 ^a
(2000)	Schold	Mixers (Lacquer)	6.3	^b
(2000)	Schold	Mixers (Lacquer)	6.3	^b
2001	C-9	Press	4,452	19.0 ^c
2007	PP-2	Mixers (Pigment)	9.6	9.6
2007	PP-1	Mixers (Pigment)	9.6	0.03
2007	C-11	Press	2,194	21.94 ^d

^a These figures are taken from the TSD for CP 089-3522-00062, issued May 23, 1995.

^b All lacquer production limited to less than 24.06 tons per year, all pigment production limited to less than 24.0 tons per year in permit 089-3522-00062 in 1995. All subsequent additions to these facilities (Schold mixers in 2000 and sandmill 703 in 2002 are added under this cap.

^c Limited as shown in permit # 089-11272-00062, issued April 25, 2000.

^d Limited as shown in permit # 089-23352-00062, issued February 27, 2007.

In 1977, when the PSD rules were promulgated, the source was a major source under PSD because the PTE of VOC was greater than 250 tons per year.

In 1979, three (3) lacquer mixers (709, 713, 714) were added to the source. The increase in PTE of VOC due to this modification (6.82 tons per year) was less than the PSD significant level (40 tons per year). Therefore, PSD review was not triggered.

In 1985, two (2) presses (C-8 and C-10) were added to the source. The increase in PTE of VOC due to this modification (759 tons per year) is greater than the PSD significant level (40 tons per

year). However, conditions in the permit required the source to operate thermal oxidizers on each of these presses. IDEM estimates that the actual increase in PTE after the thermal oxidizers was less than 40 tons per year. Therefore, PSD review was not triggered.

In 1985, the source added a Bucket Wash facility. The increase in PTE of VOC due to this modification (141.4 tons per year) is greater than the PSD significant level (40 tons per year). However, the source accepted limits on the bucket wash of 9.9 tons per year. The increase in PTE of VOC after controls and limits was less than 40 tons per year. Therefore, PSD review was not triggered.

In 1985, the source added a hazardous waste storage tank. The increase in PTE of VOC due to this modification was less than 1 ton per year. Therefore, PSD review was not triggered.

Since the modifications performed in 1985 occurred within a period of one (1) year, these modifications are treated as a single project, and the increase in PTE due to these modifications are limited to less than 40 tons per year. The Bucket Wash facility was removed prior to 1999, so it is not included in the limit. The following limit has been added to the permit:

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications performed in 1985, the Permittee shall comply with the following:

- (1) The total input of VOC to presses C-8 and C-10, including cleanup solvent, shall be limited to 779 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The minimum overall VOC control efficiency for the thermal oxidizers for presses C-8 and C-10 shall be 95.0%.

Combined with the VOC emissions from the hazardous waste storage tank (less than 1 ton per year), the VOC emissions from the modifications performed in 1985 are limited to less than 40.0 tons per twelve (12) consecutive month period. Compliance with the above limits shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications performed in 1985.

On November 15, 1990, Lake County was designated as severe nonattainment for the 1-hour ozone standard. The potential to emit of VOC from the entire source was greater than 25 tons per year. Therefore, the source was a major source under 326 IAC 2-3 (Emission Offset). For any subsequent modifications, a total increase in PTE of VOC or NO_x greater than the de minimis level of 25 tons per year triggered 326 IAC 2-3 (Emission Offset). As a consequence of the new nonattainment area designation for the one-hour ozone standard, this source was a minor source under PSD because no attainment pollutant was emitted at a rate greater than 250 tons per year.

In 1991, volatile liquid storage tanks (Tank Farm) were added to the source. The increase in PTE of VOC due to this modification is 4.2 tons per year. The increase in VOC due to this modification (4.2 tons per year) plus the total increases in VOC emissions at this source in the five year period prior to this modification (0 tons per year) were equal to 4.2 tons per year ($0 + 4.2 = 4.2$ tons per year). This increase was less than the de minimis level (25 tons per year). No increase in NO_x emissions resulted from this modification. Therefore, Emission Offset review was not triggered. The provisions of PSD were also not triggered by this modification because no attainment pollutant was emitted at greater than 250 tons per year.

In 1993, two (2) lacquer mixers (710 and 711) and two (2) sand mills (802 and 803 (now 703)) were added to the source. The increase in PTE of VOC due to the addition of units 710, 711, 802, and 803 is 11.0 tons per year. Three (3) lacquer mixers (709, 713, and 714) were replaced with units having the same PTE as the units replaced. Lacking data on past actual emissions for mixers 709, 713, and 714, the increase in VOC (6.82 tons per year) due to these replacements is equivalent to the PTE of these units (Increase in PTE = PTE - Past Actuals). The increase in VOC due to this modification ($11.0 + 6.82 = 17.82$ tons per year) plus the total increases in VOC emissions at this source in the five year period prior to this modification (4.2 tons per year) were equal to 22.02 tons per year ($17.82 + 4.2 = 22.02$ tons per year). This increase was less than the

de minimis level (25 tons per year). No increase in NOx emissions resulted from this modification. Therefore, Emission Offset review was not triggered. This modification did not trigger PSD review because the PTE for each attainment pollutant remained less than 250 tons per year.

In 1995, one press (Texmac) was added to the source under 089-3522-00062, issued May 23, 1995. The increase in PTE of VOC due to this modification is 180 tons per year. However, conditions in the permit required that the source control emissions from this press. The limited increase in VOC due to this modification is 2.7 tons per year. The total increases in VOC emissions at this source in the five year period prior to this modification ($4.2 + 17.82 = 22.02$ tons per year) plus the limited increase in VOC due to this modification (2.7 tons per year) were equal to 24.72 tons per year ($17.82 + 4.2 + 2.7 = 24.72$ tons per year). This increase was less than the de minimis level (25 tons per year). No increase in NOx emissions resulted from this modification. Therefore, Emission Offset review was not triggered. This modification did not trigger PSD review because the source-wide PTE for each attainment pollutant remained less than 250 tons per year.

In permit 089-3522-00062, issued May 23, 1995, the source accepted limits on emissions of VOC from all existing Lacquer Production facilities (less than 24.06 tons VOC per year), all existing Pigment Production facilities (less than 24.0 tons per year), the Bucket Wash (less than 9.9 tons per year), the press C-7 (21.1 tons per year), the press C-10 (19.3 tons per year), the press C- 8 (19.3 tons per year), and the storage tanks (4.2 tons per year). However, the source remained a major source under 326 IAC 2-3 because the limited PTE of VOC was greater than 25 tons per year. The Bucket Wash was removed prior to the issuance of 089-7441-00062 on July 16, 1999.

In 1999, in the TSD for Permit 089-7441-00062, issued July 16, 1999, this source was considered a major source under 326 IAC 2-3 (Emission Offset) because the PTE of VOC from the entire source was greater than 25 tons per year. Lake County was still designated as a severe nonattainment area.

In 2000, the source replaced two (2) existing mixers with the two (2) Schold mixers. The two (2) Schold mixers have a total potential to emit VOC of 12.6 tons per year. The construction of the new mixers did not trigger 326 IAC 2-3 because the PTE of these mixers (12.6 tons per year) plus the contemporaneous increases in PTE (0 tons per year) minus the contemporaneous decreases (9.9 tons per year for removal of the Bucket Wash) equals 2.7 tons per year ($12.6 + 0 - 9.9 = 2.7$), which is less than the de minimis threshold of 25 tons per year. Note that increases in NOx emissions did not need to be evaluated to determine the applicability of 326 IAC 2-3 because the U.S. EPA granted a NOx waiver on January 26, 1996 to Lake County (see 40 CFR 52.777(i)). The waiver was based on the finding that NOx did not contribute significantly to the failure to meet the 1-hour ozone standard in Lake County. As a result of this waiver, only VOC emission increases were evaluated to determine 326 IAC 2-3 (Emission Offset) applicability for the 1-hour ozone standard for the modifications that occurred between January 26, 1996 and on August 7, 2006 (i.e. the date the 1-hour ozone standard was revoked in Indiana). This modification did not trigger PSD review because the source-wide PTE for each attainment pollutant remained less than 250 tons per year.

In 2001, the source added a press (C-9) under SSM 089-11272-00062, issued April 25, 2000. The increase in PTE of VOC due to this modification (4,452 tons per year) is greater than the Emission Offset significant level (25 tons per year). However, conditions in SSM 089-11272-00062 required that the source control emissions from this press. The limited increase in VOC due to this modification is 19.0 tons per year. The total increases in VOC emissions at this source in the five year period prior to this modification (2.7 tons per year) plus the limited increase in VOC due to this modification (19.0 tons per year) were equal to 21.7 tons per year. This amount is less than the de minimis level (25 tons per year). Therefore, Emission Offset review was not triggered. This modification did not trigger PSD review because the source-wide PTE for each attainment pollutant remained less than 250 tons per year.

In late 2001, the source replaced an existing sandmill (803) with a replacement sandmill (703). The potential to emit of VOC from the new sandmill is 0.35 tons per year. The increase in VOC due to this modification (0.35 tons per year) added to the increases in PTE of VOC for modifications made within the previous five years (21.7 tons per year) were equal to 22.05 tons

per year. This amount is less than the de minimis level (25 tons per year). Therefore, Emission Offset review was not triggered. This modification did not trigger PSD review because the source-wide PTE for each attainment pollutant remained less than 250 tons per year.

On June 15, 2005, the U.S. EPA designated Lake County as moderate nonattainment for the 8-hour ozone standard and revoked the 1-hour ozone standard. The revocation of the 1-hour ozone standard went into effect in Indiana on August 7, 2006, when 326 IAC 1-4-1 was amended.

In 2007, the source added two (2) pigment mixers (PP-1 and PP-2) and one (1) press (C-11) under SSM 089-23352-00062, issued February 27, 2007. The increase in PTE of VOC due to this modification (2,214 tons per year) is greater than the significant level of 40 tons per year. However, the permit included requirements that VOC emissions from the press be controlled at an overall efficiency of at least 99%, (this is equivalent to an emission limit of 5.01 pounds of VOC per hour) for a PTE after controls of 21.94 tons per year. The PTE of the pigment mixers (PP-2 and M 715) after integral control is 9.63 tons per year. The two mixers are also limited by an existing limit on all pigment production facilities of 24.0 tons per year. The increase in PTE of VOC after controls and limits (31.6 tons per year) is less than the 40 ton per year applicability threshold for 326 IAC 2-3. The increase in NOx emissions (0.73 tons per year) due to this modification is less than the 40 ton per year applicability threshold for 326 IAC 2-3. Therefore, Emission Offset review was not triggered. The source-wide PTE of all attainment pollutants remained less than the 250 ton per year major source thresholds for 326 IAC 2-2 (PSD). Therefore, the requirements of PSD did not apply.

On December 22, 2006, the United States Court of Appeals, District of Columbia issued a decision that partially vacated and remanded the U.S. EPA's final rule for implementation of the 8-hour National Ambient Air quality Standard for ozone (see South Coast Air Quality Mgmt. Dist. v. EPA, 472 F.3d 882 (D.C. Cir., December 22, 2006), rehearing denied 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007)). As a result of this decision by the United States Court of Appeals, the U.S. EPA instructed IDEM to issue permits for sources located in Lake County using the applicability thresholds and offset ratios that were in effect under the 1-hour ozone designation, in order to address the anti-backsliding provisions of the Clean Air Act. Therefore, modifications to this source made after June 8, 2007 (the date the rehearing was denied) that result in an increase in VOC emissions equal to or greater than the de minimus would trigger 326 IAC 2-3 (Emission Offset). This source has made no modifications after June 8, 2007.

PM10, SO₂ and CO emissions:

The portion of Lake County in which this source is located was previously designated as nonattainment for PM10, SO₂ and CO. However, the source-wide PTE of PM10, SO₂ and CO have never exceeded the 100 tons per year applicability threshold for 326 IAC 2-3. Therefore, none of the modifications that occurred at this plant would have triggered review under the provisions of 326 IAC 2-3 (Emission Offset).

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

The operation of printing presses C-9 and C-11, constructed after July 27, 1997, each emit greater than ten (10) tons per year for a single HAP and twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to these presses. However, pursuant to 326 IAC 2-4.1-1(b)(2), because these presses are specifically regulated by NESHAP 40 CFR 63, Subpart KK, which was issued pursuant to Section 112(d) of the CAA, these printing presses are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Since this source is located in Lake County and has the potential to emit greater than 25 tons per year of VOC, the Permittee must submit annual emission statements certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Avery Dennison is located in the portion of Lake County defined in 326 IAC 5-1-1(c)(4). 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements)

Although located in Lake County, this source is not subject to the provisions of 326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements) because it does not have the potential to emit greater 5 tons per year of fugitive particulate emissions.

326 IAC 6.8-2 through 6.8-11 (Lake County: PM10 Emission Requirements)

Although located in Lake County, this source is not subject to the provisions of 326 IAC 6.8-2 because it is not one of the sources specifically listed in this rule.

326 IAC 6.8-1-2 (Particulate Emission Limitations for Lake County)

Although located in Lake County, this source is not subject to the provisions of 326 IAC 6.8-1-2 because this source does not have the potential to emit PM equal to or greater than 100 tons per year or actual PM emissions equal to or greater than 10 tons per year.

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

This source is not subject to the provisions of 326 IAC 6-5 because it does not have potential fugitive particulate matter emissions greater than 25 tons per year.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

The provisions of 326 IAC 8-6 do not apply to this source because the emission units are subject to other Article 8 rules.

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

Pursuant to 326 IAC 8-1-5 (Petition for Site-Specific Reasonably Available Control Technology (RACT) Plan) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties), the following condition was incorporated into OP 2360-0062-0619, OP 2360-0062-0620 and OP 2360-0062-0621, issued on August 6, 1990:

Emissions into the ambient air from the four (4) packaging rotogravure printing presses (C-7, C-8, C-10 and Texmac) of any material that may be considered toxic by applicable state or federal rules shall be controlled using Reasonable Available Control Technology with the goal of limiting levels of these materials at the property line to one-half of one percent of the 8-hour threshold limit values (TLV's) recommended by the American Conference of Governmental Industrial Hygienists.

However, a reevaluation of the rule applicability of 326 IAC 8-7 was done in January 1995. Pursuant to this reevaluation it was determined that rule 326 IAC 8-7 was not applicable to this source. The above listed condition was deleted from the original part 70 operation permit No. 089-7441-00062 by SSM 089-23352-00062, issued February 27, 2007.

State Rule Applicability – Rotogravure Printing Presses

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

Pursuant to 326 IAC 8-5-5(a)(3), the six (6) packaging rotogravure printing presses (C-7, C-8, C-9, C-10, C-11 and Texmac) are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because they are located in Lake County and the source-wide VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-5-5, the Permittee shall operate an incineration system that oxidizes at least ninety (90) percent of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water. The overall control efficiency shall be equal to or greater than sixty-five (65) percent.

Pursuant to 326 IAC 8-5-5(a)(3) and 326 IAC 8-1-12, the Permittee shall comply with the following requirements:

- (a) Control system operation, maintenance, and testing requirements shall be as follows:
- (1) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
 - (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
 - (3) The control system shall be tested according to the following schedule and in the following situations:
 - (A) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (B) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (C) A compliance test shall be performed within ninety (90) days of:
 - (i) Startup of a new coating facility;
 - (ii) Changing the method of compliance for an existing coating facility from compliance coatings or daily-weighted averaging to control devices; or
 - (iii) Receipt of a written request from the department or U.S. EPA.
 - (iv) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (D) Test procedures.
 - (E) Operating and control system parameters.
 - (F) Type of VOC containing process material being used

- (G) The process and control system parameters that will be monitored during the test.
- (b) Monitoring equipment requirements shall be as follows:
- If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade, whichever is more accurate.
- (c) On and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliance coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day for each coating facility:
- (1) The name and identification of each coating used at each coating facility.
 - (2) The weight of VOC of each coating used at the facility on a daily basis.
 - (3) The required overall emission reduction efficiency for each day for each coating facility.
 - (4) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (a)(3).
 - (5) Control device monitoring data as follows:
 - (A) For thermal incinerators, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (twenty-eight degrees Centigrade) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (6) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility
 - (7) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- (d) The Permittee shall notify the department in either of the following instances:
- (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.

(C) Time, date and duration of the noncompliance.

(D) Corrective action taken.

- (2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of section 10(b) or 11(b) of this rule, respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of section 10 or 11 of this rule, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-1-12.

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

The rotogravure printing presses are not subject to 326 IAC 6-3 because they do not have the potential to emit PM.

State Rule Applicability – Pigment and Lacquer Production Lines

326 IAC 8-1-6 (General Reduction Requirements)

In CP 089-3522-00062, the Permittee accepted limits on pigment production and lacquer production such that emissions from each of these facilities would be less than 25 tons per year. Technical analysis performed at that time revealed that 0.0694 tons of VOC is emitted per ton of pigment produced and 0.00032 tons of VOC is emitted per ton of lacquer produced. The VOC limits accepted in CP 089-3522-00062 and included in Condition D.2.6 of T089-7441-00062, issued on July 16, 1999, are not federally enforceable because they did not include VOC emission limits in terms of pounds per hour. The limits have been revised to make them enforceable.

Pursuant to CP 089-3522-00062, issued August 11, 1995:

- (a) The pigment produced by the pigment stripper shall be limited to 96.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Emissions from the pigment stripper shall be limited to less than 497 pounds of VOC per ton of pigment produced.
- (b) The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emissions from lacquer production shall be limited to less than 0.64 pounds of VOC per ton of lacquer produced.

Compliance with these limits renders the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (General Reduction Requirements) not applicable to the modifications completed pursuant to CP 089-3522-00062, issued August 11, 1995, and SSM 089-23352-00062, issued February 27, 2007.

Since the VOC emissions from the pigment production and lacquer production are within the VOC emission limits, testing will not be required.

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

The Pigment and Lacquer Production Lines are not subject to 326 IAC 6-3 because the potential to emit PM for these processes is less than 0.0551 lbs per hour.

State Rule Applicability – Hochmeyer and Myers Mixer (PP-1 and PP-2)

326 IAC 8-1-6 (General Reduction Requirements)

Although constructed after January 1, 1980, the Hockmeyer and Myers mixers both have potential VOC emissions less than 25 tons per year. Therefore, these facilities are not subject to the provisions of 326 IAC 8-1-6.

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

These units are not subject to 326 IAC 6-3 because the potential to emit PM is less than 0.0551 lbs per hour.

State Rule Applicability – Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The 6,000-gallon hazardous waste above ground storage tank and the fifteen (15) volatile organic liquid storage tanks are only subject to the record keeping requirements of 326 IAC 8-9-6(a) and (b) because each of their storage capacities are less than 39,000 gallons. Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

State Rule Applicability – Degreasing

326 IAC 8-3-2 (Cold Cleaner Operations)

The cold cleaner degreasing operations are subject to the provisions of 326 IAC 8-3-2 because the degreasing operations were constructed in Lake County prior to January 1, 1980 at a source that has potential VOC emissions greater than 100 tons per year.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations, 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.

326 IAC 8-3-5 (Cold Cleaner Operation and Control)

The cold cleaner is subject to the provisions of 326 IAC 8-3-5 because it is a cold cleaner that was constructed in Lake County prior July 1, 1990 without a remote solvent reservoir.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability – Boiler

326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

The boiler is subject to the provisions of 326 IAC 6-2-4 because it was constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 5.25 million British thermal unit per hour natural gas fired boiler constructed in 1986, shall be limited to 0.6 pounds per million British thermal unit heat input.

Pursuant to 326 IAC 6-2-4, the PM emissions

$$Pt = 1.09 / Q^{0.26} = 1.09 / 5.25^{0.26} = 0.71 \text{ MMBtu/hr}$$

where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

or

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

According to AP 42, the boiler should be able to comply with the limit.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The boiler is not subject to the provisions of 326 IAC 7-1.1-2 because the potential to emit sulfur dioxide is less than 25 tons per year and 10 pounds per hour.

326 IAC 7-4.1 (Lake County Sulfur Dioxide Emission Limitations)

Although located in Lake County, the boiler is not subject to the provisions of 326 IAC 7-4.1 because this boiler is not one of the emissions units listed in this rule.

Testing Requirements

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Press C-7, C-10, Texmac	Thermal Oxidizer	Not later than October 2011	VOC	Every five (5) years	C-7 and Texmac: 90% destruction (326 IAC 8-5-5) C-10: 95% destruction (326 IAC 2-2)
Press C-8	Thermal Oxidizer	Not later than May 2012	VOC	Every five (5) years	C-8: 90% destruction (326 IAC 8-5-5) C-8: 95% destruction (326 IAC 2-2)
Press C-9	Thermal Oxidizer	Not later than August 2011	VOC	Every five (5) years	C-9: 90% destruction (326 IAC 8-5-5) C-9: 98.5% destruction (326 IAC 2-2)
Press C-11	Thermal Oxidizer	Not later than June 2012	VOC	Every five (5) years	C-11: 90% destruction (326 IAC 8-5-5) C-11: 5.01 lbs per hour (326 IAC 2-3)

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance requirements applicable to this source are as follows:

- (a) The thermal oxidizers controlling the packaging rotogravure presses, identified as C-7, C-8, C-9, C-10, C-11, and Texmac have applicable compliance determination conditions as specified below:

Compliance with 326 IAC 8-5-5

Control	Parameter	Frequency	Range	Excursions and Exceedances
Compliance with 326 IAC 8-5-5	Temperature in combustion zone	continuously	at or above minimum established at last compliance test to achieve 90% control of VOC	Response Steps
Compliance with CFR 63.820, Subpart KK	Temperature in combustion zone	continuously	at or above minimum established at last compliance test to achieve overall 95% control of HAP	Response Steps
Compliance with CFR 63.820, Subpart KK	Capture system operating parameter as established during last compliance test	continuously	at or above minimum established at last compliance test to achieve overall 95% control of HAP	Response Steps
Compliance with Emission Offset Minor Limit [326 IAC 2-3] (just for Thermal Oxidizer on press C-9)	Temperature in combustion zone	continuously	at or above minimum established at last compliance test to achieve overall 98.5% control of VOC	Response Steps

These compliance determination and monitoring conditions are necessary because the thermal oxidizer for the packaging rotogravure printing press must operate properly for presses C-9 and C-11 to remain not applicable for Emission Offset, 326 IAC 2-3. For all of the presses, compliance with these requirements also satisfies the requirements in 40 CFR 63.820, Subpart KK, which is 95% overall control and 326 IAC 8-5-5 (Graphic Arts Operations), which is 65% overall control.

- (b) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM) are applicable to rotogravure printing presses C-7, C-8, C-9, C-10 and C-11 for VOC emissions. All of these printing presses are not large pursuant to 40 CFR 64.5(a)(3), therefore the source submitted a CAM Plan for these printing presses during the review of this Part 70 Permit Renewal. The source proposed that the requirements to use control equipment, monitoring and recordkeeping of parameters to show compliance with 326 IAC 2-3, 326 IAC 8-1-12, 326 IAC 8-5-5 and 40 CFR 63, Subpart KK should be sufficient to satisfy the monitoring plan, reporting and recordkeeping requirements of 40 CFR 64. Upon further review, IDEM, OAQ agrees with this proposal. The compliance requirements listed in item (a) above show continuous compliance with applicable requirements and also put in the permit as conditions and hence will be accepted for compliance assurance pursuant to 40 CFR 64.
- (c) The Myers Mixer, identified as PP-1, shall operate the two (2) condensers at all times that the mixer is operated. The condensers shall be operated and maintained according to the manufacturers specifications. These conditions are necessary to document compliance with 326 IAC 8-1-6 and 326 IAC 2-3

- (d) The Permittee shall maintain monthly records of pigment produced by the pigment stripper and the amount of lacquer ingredients mixed in the lacquer production mixers. A quarterly summary of the monthly records shall be submitted to IDEM, OAQ within thirty (30) days after the end of the quarter being reported. These conditions are necessary to document compliance with 326 IAC 8-1-6 and 326 IAC 2-3.

Recommendation

The staff recommends to the commissioner that the Part 70 permit renewal 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.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on October 7, 2003.

Conclusion

The operation of this stationary commercial rotogravure printing and pigment and lacquer manufacturing operation shall be subject to the conditions of the attached Part 70 permit T089-18134-00062.

Appendix A: Emissions Calculations

VOC and HAPs

From Rotogravure Press C-9

Company Name: Avery Dennison PFD
 Address City IN Zip: 650 West 67th Avenue, Schererville IN 46375
 Operation Permit Renewal: 089-18134-00089
 Reviewer: ERG/ST
 Date: November 12, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	HAPs Potential (lbs/hr)	HAPs Potential (ton/yr)
Methyl Isobutyl Ketone (MIBK)	6.70	100.00%	0.0%	100.0%	0.0%	0.00%	68.32000	1.000	6.70	6.70	457.74	10985.86	2004.92	12.94	56.68
Methyl Ethyl Ketone (MEK)	6.70	100.00%	0.0%	100.0%	0.0%	0.00%	14.16000	1.000	6.70	6.70	94.87	2276.93	415.54	0.00	0.00
Ethyl Acetate (ETAC)	7.50	100.00%	0.0%	100.0%	0.0%	0.00%	0.35000	1.000	7.50	7.50	2.63	63.00	11.50	0.00	0.00
N-Butyl Alcohol	6.80	100.00%	0.0%	100.0%	0.0%	0.00%	67.82000	1.000	6.80	6.80	461.18	11068.22	2019.95	0.00	0.00

State Potential Emissions	Worst Case Solvents							Uncontrolled PTE			1016.42	24394.01	4451.91	12.94	56.68
								Controlled PTE					66.78	0.19	0.85

VOC and HAP emissions are controlled by a thermal oxidizer with a 98.5% control efficiency.
PTE of VOC emissions from this Press is limited to 19 tons per year to render the requirements of Emission Offset (326 IAC 2-3) not applicable.
This limit was incorporated through significant source modification 089-11272-00062 issued on April 25, 2000.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations

VOC and HAPs

From Rotogravure Press C-11

Company Name: Avery Dennison PFD
 Address City IN Zip: 650 West 67th Avenue, Schererville IN 46375
 Operation Permit Renewal: 089-18134-00089
 Reviewer: ERG/ST
 Date: November 12, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	HAPs Potential (lbs/hr)	HAPs Potential (ton/yr)
Methyl Isobutyl Ketone (MIBK)	6.67	100.00%	0.0%	100.0%	0.0%	0.00%	1.94000	1.000	6.67	6.67	12.94	310.56	56.68	12.94	56.68
Toluene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	28.26000	1.000	7.26	7.26	205.17	4924.02	898.63	205.17	898.63
2- Nitro Propane (Nipar)	8.32	100.00%	0.0%	100.0%	0.0%	0.00%	2.55000	1.000	8.32	8.32	21.22	509.18	92.93	21.22	92.93
Xylene	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.02000	1.000	7.25	7.25	0.15	3.48	0.64	0.15	0.64
Methyl Ethyl Ketone (MEK)	6.71	100.00%	0.0%	100.0%	0.0%	0.00%	2.27000	1.000	6.71	6.71	15.23	365.56	66.71	0.00	0.00
Methyl Propyl Ketone (MPK)	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	26.52000	1.000	6.73	6.73	178.48	4283.51	781.74	0.00	0.00
Isopropyl Acetate (IPAC)	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	2.18000	1.000	7.26	7.26	15.83	379.84	69.32	0.00	0.00
Isopropyl Alcohol (IPOH)	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	7.53000	1.000	6.57	6.57	49.47	1187.33	216.69	0.00	0.00
Ethyl Acetate (ETAC)	7.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.00390	1.000	7.51	7.51	0.03	0.70	0.13	0.00	0.00
Aromatic Hydrocarbons (HiSol 10)	7.30	100.00%	0.0%	100.0%	0.0%	0.00%	0.20000	1.000	7.30	7.30	1.46	35.04	6.39	0.00	0.00
Ekasolve PM Acetate	7.65	100.00%	0.0%	100.0%	0.0%	0.00%	0.12000	1.000	7.65	7.65	0.92	22.03	4.02	0.00	0.00

State Potential Emissions		Worst Case Solvents						Uncontrolled PTE			500.89	12021.26	2193.88	239.48	1048.88
								Controlled PTE					21.94		10.49

VOC and HAP emissions are controlled by a thermal oxidizer with a 99% control efficiency.

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations						Page 3 of 7 TSD App A	
Natural Gas Combustion Only							
MM BTU/HR <100							
C-9 & C-11 Thermal Oxidizers							
Company Name:		Avery Dennison PFD					
Address City IN Zip:		650 West 67th Avenue, Schererville IN 46375					
Operation Permit Renewal:		089-18134-00089					
Reviewer:		ERG/ST					
Date:		November 12, 2007					
Heat Input Capacity		Potential Throughput					
MMBtu/hr		MMCF/yr					
5.50		48.2					
						Pollutant	
		PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF		1.9	7.6	0.6	50.0	5.5	84.0
					**see below		
Potential Emission in tons/yr		0.05	0.18	0.01	1.20	0.13	2.02
*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 2 for HAPs emissions calculations.							

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Avery Dennison PFD

Address City IN Zip: 650 West 67th Avenue, Schererville IN 46375

Operation Permit Renewal: 089-18134-00089

Reviewer: ERG/KHB

Date: September 10, 2007

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.059E-05	2.891E-05	1.807E-03	4.336E-02	8.191E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.205E-05	2.650E-05	3.373E-05	9.154E-06	5.059E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

for

Pigment Production Area

Company Name: Avery Dennison PFD

Address City IN Zip: 650 West 67th Avenue, Schererville IN 46375

Operation Permit Renewal: 089-18134-00089

Reviewer: ERG/ST

Date: November 12, 2007

The pigment production system consists of the following equipment: stripper tub, homogenizer tub, spent acetone tank, product tank, and two sludge tanks.

The emission factor for the operation of this collection of equipment that was used for previously issued Construction Permit 089-3522-00062 is 0.249 ton of VOC emitted per ton of pigment produced. This factor results in a throughput limit of 96.5 tons of pigment/yr to limit the VOC emissions to 24 tons per year to render the requirements of 326 IAC 2-3 not applicable to this equipment.

24 tons of VOC	X	ton of pigment produced	=	96.5 tons of pigment produced
year		0.2487 ton of VOC emitted		year

Appendix A: Emissions Calculations

Lacquer Production Area

Company Name: Avery Dennison PFD
 Address City IN Zip: 650 West 67th Avenue, Schererville IN 46374
 Operation Permit Renewal: 089-18134-00089
 Reviewer: ERG/ST
 Date: November 12, 2007

The lacquer production system consists of the following equipment: ten mixers and three mills.

The emission factor for the operation of this collection of equipment that was used for previously issued Construction Permit 089-3522-00062 is 0.00032 ton of VOC emitted per ton of lacquer ingredient mixed. This factor results in a throughput limit of 75,000 tons of lacquer ingredients/yr to limit the VOC emissions to 24 tons per year to render the requirements of 326 IAC 2-3 not applicable to this equipment.

24 tons of VOC	X	ton of lacquer ingredients mixed	=	75,000 tons of lacquer ingredients mixed
year		0.00032 ton of VOC emitted		year

Appendix A: Emissions Calculations								Appendix A, Page 7 of 7
Emissions Summary for Part 70 Permit Renewal								
Company Name:		Avery Dennison PFD						
Address City IN Zip:		650 West 67th Avenue, Schererville IN 46375						
Operation Permit Renewal:		089-18134-00089						
Reviewer:		ERG/ST						
Date:		November 12, 2007						
Potential to Emit								
Emission Units/Process	PM Tons/yr	PM10 Tons/yr	S02 Tons/yr	VOC Tons/yr	CO Tons/yr	Nox Tons/yr	Single HAP Tons/yr	Total HAPs Tons/yr
Pre-1995 Emissions, Prior to Issuance of CP 089-3522-00062.	1.20	1.20	0.10	422.00	13.00	15.50		
Texmac Surface Coater				2.70			0.66	1.49
Lacquer Production Line				24.06			5.34	12.96
Pigment Production Line				23.80			0.45	0.76
Tank Farm				4.15			1.12	3.36
Press C-9				19.00			0.85	0.85
Press C-11				39.50			8.98	10.49
Natural Gas Combustion from C-9 & C-11	0.20	0.80	0.00	0.60	9.60	5.70	0.20	0.20
TOTAL	1.40	2.00	0.10	535.81	22.60	21.20	17.60	30.11
NOTES:								
*The PTE for a unit or process is based on limits established in the permit or unrestricted operation if the unit or process is not constrained by a limit.								
*PTE emissions for Texmac Surface Coater, Lacquer Production Line, Pigment Production Line and the Tank farms were taken from CP-089-3522-00062 issued on August 11, 1995.								
*Controlled and limited emissions from the Press C-9 are taken from significant source modification 089-11272-00062 issued on April 25, 2000.								
* PM10 emissions are considered equivalent to PM.								