



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

July 15, 2004

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

TO: Interested Parties / Applicant

RE: Printpack, Inc / 031-19138-00001

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

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-MOD.dot 9/16/03



*Joseph E. Kernan*  
Governor

*Lori F. Kaplan*  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

July 15, 2004

Mr. Todd Foster  
Printpack, Inc.  
P.O. Box 43687  
Atlanta, GA 30336

Re: 031-19138-00001  
Minor Source Modification to:  
Part 70 permit No.T031-5950-00001

Dear Mr. Foster:

Printpack, Inc. was issued a Part 70 operating permit (T031-5950-00001) on December 21, 1998 for a plastic bag and plastic film production plant. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.
- (b) One (1) enclosed soda blaster, constructed in 2004.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.



6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the minor permit modification has been issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

ERG/YC

cc: File - Decatur County  
Decatur County Health Department  
Air Compliance Section Inspector - Patrick Burton  
Compliance Data Section  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner  
Title V Renewal Reviewer - ERG/AO  
Title V Renewal File - T031-17541-00001



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

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

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

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

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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T031-5950-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 21, 1998  Expiration Date: December 21, 2003

First Administrative Amendment No.: 031-10694-00001, issued March 9, 1999  
First Minor Permit Modification No.: 031-10656-00001, issued September 10, 1999  
First Significant Permit Modification No.: 031-12005-00001, issued November 22, 2000  
First Reopening No.: 031-13177-00001, issued December 10, 2001

First Minor Source Modification Permit No. 031-19138-00001	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 15, 2004



## 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)]

---

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

Responsible Official:	Plant Manager
Source Address:	1505 West Main Street, Greensburg, Indiana 47240
Mailing Address:	1505 West Main Street, Greensburg, Indiana 47240
SIC Code:	2673 and 3081
County Location:	Decatur
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

---

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

- (a) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute.
- (b) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (c) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (d) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute.
- (e) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (f) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute.
- (g) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute.

- (h) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (i) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.
- (j) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (k) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (l) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (m) One (1) manual parts washer system, identified as PW1, using no control, and exhausting to stack SW1.
- (n) One (1) flexographic printing press, identified as P17, including a drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute.
- (o) Two (2) flexographic printing presses, identified as P18 and P19, including drying systems rated at 0.8 million British thermal units per hour (MM Btu/hr) each, using a natural gas fired regenerative thermal oxidizer, OX20, with a rated capacity of 8.8 MM Btu/hr as control, and exhausting to stack SP20. The maximum printing width for each press is 62 inches and the maximum output is 1200 feet per minute.
- (p) One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements. The insignificant sources at this facility which do not have applicable rules are included in the technical support document for this permit.

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).

## SECTION D.10

## FACILITY OPERATION CONDITIONS

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

- (p) One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.

(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.10.1 Volatile Organic Compound (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 2-7-10.5(d) (Part 70 Minor Source Modification), the total VOC usage (which is defined as the total VOC input minus the total VOC output) in the photopolymer plate making system (PH01) shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This also makes the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable.

#### D.10.2 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 these facilities and the control device.

### Compliance Determination Requirements

#### D.10.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limit contained in Condition D.10.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.10.4 Record Keeping Requirements

- (a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each solvent used.
  - (2) The amount of solvent less water used on monthly basis.
    - (A) Records shall include the documentation necessary to verify the type and amount of solvent used, which may include but is not limited to purchase orders, invoices, and material safety data sheets (MSDS).
    - (B) Records for solvent output shall include the documentation necessary to verify the amount of solvent removed as waste, which

may include but is not limited to waste disposal records, waste manifests, and waste profiles.

- (3) The total VOC usage for each month, which is defined as the total VOC input minus the total VOC output.
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.10.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

## Part 70 Quarterly Report

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, Indiana 47240  
Mailing Address: 1505 West Main Street, Greensburg, Indiana 47240  
Part 70 Permit No.: 031-5950-00001  
Facility: Photopolymer Plate Making System (PH01)  
Parameter: VOC usage (Total VOC input minus total VOC output)  
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Minor Permit Modification

#### Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	1505 West Main Street, Greensburg, Indiana 47240
County:	Decatur
SIC Code:	2673 and 3081
Operation Permit No.:	T031-5950-00001
Operation Permit Issuance Date:	December 21, 1998
Minor Source Modification No.:	031-19138-00001
Minor Permit Modification No.:	031-19204-00001
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Printpack, Inc. relating to the construction and operation of the following emission units:

- (a) One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.
- (b) One (1) enclosed soda blaster, constructed in 2004.

#### History

Printpack, Inc. is an existing plastic bag and plastic film production plant and their Part 70 permit (T031-5950-00001) was issued on December 21, 1998. On May 7, 2004, Printpack, Inc. submitted an application to the OAQ requesting permission to construct and operate a photopolymer plate making system (PH01) and a soda blaster to clean parts. For the proposed plate making system PH01, VOC (major pollutant) is emitted from the plate washing, rising, and drying processes. The proposed soda blaster is an enclosed system, and therefore, it is not considered an emission unit and will not be included in the revised Part 70 permit.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SP21	PH01	35	0.833	2,000	110

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Part 70 Minor Permit Modification 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 application for the purposes of this review was received on May 7, 2004. Additional information was received on June 17, 2004.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1).

## Unrestricted Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	--
PM-10	--
SO <sub>2</sub>	--
VOC	67.5
CO	--
NO <sub>x</sub>	--

## Justification for Modification

This modification is being performed through a Part 70 Minor Source Modification because the potential to emit VOC of this modification is limited to less than 25 tons/yr by limiting the VOC usage, pursuant to 326 IAC 2-7-10.5(d)(5)(A). The permit modification is being performed through a Part 70 Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because this modification meets all the requirements in 326 IAC 2-7-12(b)(1).

## County Attainment Status

The source is located in Decatur County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Decatur County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Decatur County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	0
PM-10	0
SO <sub>2</sub>	0
VOC	518
CO	0
NOx	6.0

- (a) This existing source is a major stationary source because an attainment regulated pollutant (VOC) is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon the 2001 emission inventory submitted by the source.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Photopolymer Plate Making System (PH01)	-	-	-	Less than 25.0	-	-	-
PSD Significant Thresholds	25	15	40	40	100	40	NA

This modification to an existing PSD major source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 20, and 40 CFR Part 61 and 63) applicable to this modification.
- (c) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
  - (1) With the potential to emit before controls equal to or greater than the major source threshold;
  - (2) That is subject to an emission limitation or standard; and
  - (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not applicable to this modification.

### **State Rule Applicability - Photopolymer Plate Making System (PH01)**

#### **326 IAC 2-7-10.5 (Part 70 Source Modification)**

The proposed photopolymer plate making system has a potential to emit VOC greater than 25 tons/yr. In order to make this modification minor, the source has proposed to limit the total VOC usage (which is defined as the total VOC input minus the total VOC recycled) in photopolymer plate making system to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable.

#### **326 IAC 2-2 (PSD)**

This source is an existing PSD major source and the potential to emit VOC from the proposed plate making system is greater than 40 tons/yr. However, the source has proposed to limit the VOC usage for this unit to less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

#### **326 IAC 2-4.1 (New Source Toxic Control)**

There are no HAP emissions from the proposed photopolymer plate making system. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

#### **326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

The potential VOC emissions from the proposed plate making system are greater than 25 tons per year. However, the source has proposed to limited the VOC usage in this system to less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill

the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no specific monitoring requirements for the photopolymer plate making system (PH01).

### Proposed Changes

Language with a line through it has been deleted and language in bold has been added. In addition, "Office Air Management (OAM)" is now "Office of Air Quality (OAQ)". Therefore, this name change has been made through the whole permit. The source also requested to change the mailing address of this source to be the same as the source address throughout the whole permit.

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

---

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

Responsible Official:	<del>Randy E. Carter</del> <b>Plant Manager</b>
Source Address:	<del>1501</del> <b>1505</b> West Main Street, Greensburg, <del>IN</del> <b>Indiana</b> 47240
Mailing Address:	<del>P.O. Box 439, Greensburg, IN 47240-0439</del> <b>1505 West Main Street, Greensburg, Indiana 47240</b>
SIC Code:	2673 and 3081
County Location:	Decatur
<b>Source Location</b> County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD <b>Minor Source, Section 112 of the Clean Air Act</b> <b>Not in 1 of 28 Source Categories</b>

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

---

.....

(p) **One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.**

## SECTION D.10

## FACILITY OPERATION CONDITIONS

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

- (p) One (1) photopolymer plate making system, identified as PH01, constructed in 2004, with a maximum throughput rate of 87 square feet per hour, and exhausting to stack SP21.

(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.10.1 Volatile Organic Compound (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 2-7-10.5(d) (Part 70 Minor Source Modification), the total VOC usage (which is defined as the total VOC input minus the total VOC output) in the photopolymer plate making system (PH01) shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This also makes the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable.

#### D.10.2 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 these facilities and the control device.

### Compliance Determination Requirements

#### D.10.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limit contained in Condition D.10.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.10.4 Record Keeping Requirements

- (a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each solvent used.
  - (2) The amount of solvent less water used on monthly basis.
    - (A) Records shall include the documentation necessary to verify the type and amount of solvent used, which may include but is not limited to purchase orders, invoices, and material safety data sheets (MSDS).

- (B) Records for solvent output shall include the documentation necessary to verify the amount of solvent removed as waste, which may include but is not limited to waste disposal records, waste manifests, and waste profiles.**
- (3) The total VOC usage for each month, which is defined as the total VOC input minus the total VOC output.**
- (4) The weight of VOCs emitted for each compliance period.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.10.5 Reporting Requirements**

**A quarterly summary of the information to document compliance with Condition D.10.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

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

## Part 70 Quarterly Report

**Source Name:** Printpack Inc.  
**Source Address:** 1505 West Main Street, Greensburg, Indiana 47240  
**Mailing Address:** 1505 West Main Street, Greensburg, Indiana 47240  
**Part 70 Permit No.:** 031-5950-00001  
**Facility:** Photopolymer Plate Making System (PH01)  
**Parameter:** VOC usage (Total VOC input minus total VOC output)  
**Limit:** Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	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:** \_\_\_\_\_

## **Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 031-19138-00001 and the operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 031-19204-00001.

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From the Photopolymer Plate Making System (PH01)**

**Company Name: Printpack, Inc.**

**Address: 1505 West Main St., Greensburg, IN 47240**

**MSM: 031-19138-00001**

**Reviewer: ERG/YC**

**Date: May 20, 2004**

Solvent	Density (lbs/gal)	Weight % VOC	Max. Throughput Rate (ft <sup>2</sup> /hr)	Max. Usage (gal/ft <sup>2</sup> )	***% Solvent Recycled	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
*Optisol	7.09	100%	87.00	0.25	90%	370	67.5
<b>Total</b>						<b>370</b>	<b>67.5</b>

\* The solvent used in this system does not contain any regulated HAP.

\*\* This is provided by the source.

**METHODOLOGY**

PTE of VOC (lbs/day) = Density (lbs/gal) x Weight % VOC x Max. Throughput Rate (ft<sup>2</sup>/hr) x Max. Usage (gal/ft<sup>2</sup>) x (1-% Solvent Recycled) x 24 hr/day

PTE of VOC (tons/yr) = PTE of VOC (lbs/day) x 365 (days/yr) x 1 ton/2000 lbs