



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 13, 2006
RE: Printpack, Inc / 105-19397-00018
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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, Room 1049, 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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Printpack, Inc.
303 N. Curry Pike
Bloomington, Indiana 47404**

(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.: T105-19397-00018	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 13, 2006 Expiration Date: June 13, 2011

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary flexographic printing facility.

Responsible Official:	Plant Manager
Source Address:	303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address:	303 N. Curry Pike, Bloomington, Indiana 47404
General Source Phone Number:	(812) 339-9294
SIC Code:	2759
County Location:	Monroe
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

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) Three (3) flexographic printing presses (#1, #2, and #3), known as EU-001, installed in 1994, with a maximum capacity of 43.2 million square inches per hour, each, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 001.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, with a maximum capacity of 43.2 million square inches per hour, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 002.
- (c) One (1) flexographic printing press, (press #5), known as EU-003, installed in 1999, with a maximum capacity of 43.2 million square inches per hour, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, with a maximum heat input capacity of 0.9 million British thermal units per hour for control of volatile organic compounds, and exhausting through stack 003.
- (d) One (1) photopolymer plate making system, identified as PH01, with a maximum plate throughput of 52.5 square feet of plates per hour, and exhausting through Stack 005.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (b) Other activities or categories not previously identified:
 - (1) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]
 - (2) Two (2) solvent storage tanks, with a capacity of 4,000 gallons each, VOC less than three (3) pounds per hour or fifteen (15) pounds per day.
- (c) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.

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, T105-19397-00018, 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 a 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) A 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 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

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

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

The submittal by the Permittee does require the certification by the "responsible official"

as defined by 326 IAC 2-7-1(34).

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (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
Indianapolis, Indiana 46204

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 T105-19397-00018 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
Indianapolis, Indiana 46204

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 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (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]

- (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
Indianapolis, Indiana 46204
- 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
Indianapolis, Indiana 46204

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 emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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
Indianapolis, Indiana 46204

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 1-16]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

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

Any monitoring or testing required by Section D of this permit shall be performed according to the

provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

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

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

C.14 Response to Excursions and 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) (select appropriate citations)) at an existing emissions unit, other than projects at a Clean Unit (or at a source with Plant-wide Applicability Limitation (PAL)), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) (select appropriate citations)) 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) (select appropriate citations)), the Permittee shall comply with following:
- (1) Prior to commencing the Before beginning actual construction of the "project" (as defined

in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) (select appropriate citations)) 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)(3) (select appropriate citations); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (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) (Select citations as applicable)) at an existing emissions unit other than Electric Utility Steam Generating Unit (add this language if working on a Utility permit), and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ (and local agency if applicable):

- (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) (Select citations as applicable), 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 other than Electric Utility Steam Generating Unit (add this language if working on a Utility permit) 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) (Select citations as applicable).
 - (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
Indianapolis, Indiana 46204

- (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 (and local agency if applicable). The general public may request this information from the IDEM, OAQ (and local agency if applicable) under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Printing Presses/Mixing Room

- (a) Three (3) flexographic printing presses (#1, #2, and #3), known as EU-001, installed in 1994, with a maximum capacity of 43.2 million square inches per hour, each, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 001.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, with a maximum capacity of 43.2 million square inches per hour, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 002.
- (c) One (1) flexographic printing press, (press #5), known as EU-003, installed in 1993, with a maximum capacity of 43.2 million square inches per hour, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, with a maximum heat input capacity of 0.9 million British thermal units per hour for control of volatile organic compounds, and exhausting through stack 003.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

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

- (a) The processes EU-001 (presses #1 - #3), EU-002 (press #4) and EU-003 (press #5) shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;
- (b) The oxidation system shall maintain a minimum destruction efficiency of 90%.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) Compliance with Condition D.1.1(a) demonstrates compliance with 326 IAC 8-2-5 (Paper Coating Operations).

D.1.3 PSD Minor Limit [326 IAC 2-2][326 IAC 2-4.1][40 CFR 63, Subpart KK][40 CFR 63, Subpart JJJJ]

- (a) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, and revised through this Part 70 operating permit, and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall limit the combined VOC emissions from processes EU-001 and EU-002 to less than two hundred forty-five and eight tenths (245.8) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, and in order to render the

requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall limit the VOC emissions from process EU-003 to less than two hundred fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (c) The Permittee shall limit the single worst case HAP emissions and combination HAP emissions from processes EU-001, EU-002 and EU-003 to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.
- (d) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, the Permittee shall maintain a minimum destruction efficiency of 90% and a capture efficiency as determined by the most recent stack test.

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

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for EU-001 and EU-002 (presses #1 - #4), EU-003 (press #5), and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

(a) To achieve compliance with the limit in Condition D.1.3 and the requirements of Conditions D.1.1 and D.1.2, the Permittee shall operate and maintain at all times the catalytic oxidizers and an associated capture system when processes EU-001, EU-002 and EU-003 are in operation.

(b) To determine compliance with Condition D.1.3, the Permittee shall apply the following:

(1) In order to determine compliance with Condition D.1.3, the following equation shall apply:

For EU-001 and EU-002

$$[X * (1 - (CE \text{ EU-001} * DE \text{ EU-001}))] + [Y * (1 - (CE \text{ EU-002} * DE \text{ EU-002}))] \\ = < 245.8 \text{ tons per year}$$

Where:

X = VOC/HAP input to EU-001 (tons VOC/HAP per year),
Y = VOC/HAP input to EU-002 (tons VOC/HAP per year)

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test.

DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test.

CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test.

DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test.

AND

For EU-003

$$[X * (1 - (CE \text{ EU-003} * DE \text{ EU-003}))] = < 250 \text{ tons per year}$$

Where:

- X = VOC/HAP input to EU-003 (tons VOC/HAP per year),
- CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test.
- DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test.

- (2) The input VOC/HAP used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer. The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; and;
- (3) Determine the 12 consecutive month period total VOC/HAP emissions utilizing the following equation:

Tons VOC/HAP per 12 consecutive month period = [(tons VOC/HAP past 11 months) + (tons VOC/HAP this month)]

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

- (a) The destruction efficiency test shall be conducted by April 20, 2010 and shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.
- (b) The capture efficiency test shall be repeated within one hundred eighty (180) days of a fundamental change, which may be indicated by operating parameters, and may include any of the following:
- (1) Adding print stations to a press;
 - (2) Increasing or decreasing the volumetric flow rate from the dryer;
 - (3) Changing the static duct pressure.

All testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.7 Monitoring Requirements [40 CFR 64.1]

Pursuant to 40 CFR 64.1 (CAM) the owner or operator shall have the following:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. The Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 550° F for EU-001 and EU-002, and the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 600° F for EU-003 or the temperature established in the most recent approved stack test.
- (1) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.3, as approved by IDEM.
 - (2) On and after the date the approved stack results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

- (b) Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s).
- (c) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.
- (d) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (4) Monthly visual inspections of rooftop ductwork;
 - (5) Annual flow direction (i.e., "smoke") tests; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.1.4.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Tons of VOC/HAP usage from inks, coatings, and press cleaning each month. (this information may be retained in the computerized information management system of the plant);
 - (2) The calculated weight of VOC/HAP emitted for each month, from processes EU-001, EU-002 and EU-003;
 - (3) The VOC/HAP emissions in tons per year shall be calculated by D.1.5 (b);
 - (4) The calculated 12 consecutive month period sum of VOC/HAP emissions for each month;
 - (5) A copy of the most recent oxidizer destruction efficiency test report
 - (6) A copy of the representative baseline capture efficiency test report;
- (b) To determine compliance with D.1.7(a), the Permittee shall maintain records of the catalytic oxidizer operating temperature (three (3) hour average);
- (c) To determine compliance with D.1.7(b), the Permittee shall maintain records of the duct pressure of the capture system (three (3) hour average); and
- (d) To determine compliance with D.1.7(d), the Permittee shall maintain results of the inspections.

All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a), (b), and (c) 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.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) Other activities or categories not previously identified:
 - (1) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]
- (c) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.

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

Pursuant to 326 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the bag folding and cutting machines shall be limited by the following:

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

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

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, a one time compliance test shall be performed to verify the percent of VOC lost during mixing from the one (1) ink mix room, identified as EU-004. The test method shall utilize methods as approved by the commissioner. Testing shall be conducted in accordance with Section C – Performance Testing.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (d) One (1) photopolymer plate making system, identified as PH01, with a maximum plate throughput of 52.5 square feet of plates per hour, and exhausting through Stack 005.

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to MSM 105-21593-00018, the VOC input at the one (1) photopolymer plate making system, identified as PH01, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than twenty-five (25) tons per year.

D.3.2 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

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

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (b) close the degreaser cover whenever parts are not being handled in the cleaner;
- (c) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operation requirements; and
- (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.

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.3.1 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.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, 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 and the VOC emission limit established in Condition D.3.1. 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 a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the amount and type used;
 - (3) The total VOC input to the process each month; and
 - (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.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 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 in 326 IAC 2-71(34).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: T105-19397-00018

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: T105-19397-00018

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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: Printpack, Inc.
 Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Part 70 Permit No.: T105-19397-00018
 Facility: EU-001 and EU-002
 Parameter: Volatile Organic Compounds (VOC) Emissions
 Limit: Less than two hundred forty-five and eight tenths (245.8) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	(X) Input VOC EU-001 (tons/month)	(Y) Input VOC EU-002 (tons/month)	(1) tons VOC this Month	(2) tons VOC Previous 11 Months	(3) 12 Month Rolling Total

Emission Calculation Methods:

VOC Emissions This Month:

(1) = $[X * (1 - (CE\ EU-001 * DE\ EU-001))] + [Y * (1 - (CE\ EU-002 * DE\ EU-002))] = \text{tons VOC/month}$

where:

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test
 DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
 CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test
 DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

Tons VOC From the Previous 11 Months:

(2) = The sum of the values determined for column (1) from the past 11 months.

12 Month Rolling Total:

(3) = (1) + (2)

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
 Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Part 70 Permit No.: T105-19397-00018
 Facility: EU-003
 Parameter: Volatile Organic Compounds (VOC) Emissions
 Limit: Less than two hundred fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Input VOC EU-003 (tons/month)	(1) tons VOC this Month	(2) tons VOC Previous 11 Months	(3) 12 Month Rolling Total

Emission Calculation Methods:

VOC Emissions This Month:	
(1)	= $[X * (1 - (CE\ EU-003 * DE\ EU-003))]$ = tons VOC/month
where:	
CE EU-003	= capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test
DE EU-003	= destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test
Tons VOC From the Previous 11 Months:	
(2)	= The sum of the values determined for column (1) from the past 11 months.
12 Month Rolling Total:	
(3)	= (1) + (2)

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: T105-19397-00018
Facility: PH01
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: T105-19397-00018

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.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Printpack, Inc.
Source Location: 303 North Curry Pike, Bloomington, Indiana 47404
County: Monroe
SIC Code: 2759
Operation Permit No.: T 105-19397-00018
Permit Reviewer: Amy Cook

On March 4, 2006, the Office of Air Quality (OAQ) had a notice published in The Herald Times, Bloomington, Indiana, stating that Printpack, Inc. had applied for the renewal of a Part 70 Operating Permit to operate a flexographic printing source. 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 March 31, 2006, Printpack, Inc. submitted comments on the draft Title V Renewal. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD but the permit will have the updated changes. Bold language has been added, the language with a line through it has been deleted. The Table of Contents has been modified to reflect any changes. The summary of the comments is as follows:

Comment 1: Condition A.2 (Emission Units and Pollution Control Equipment Summary) and Section D.1 (Facility Description) - Please remove "fifty (50) inch, eight (8) color" from the equipment description. Although the information in the permit is not confidential, Printpack would prefer to leave out as many details as possible regarding equipment specifications to prevent easy access to production capabilities by competitors.

Response to Comment 1: This language has been removed. Therefore, the permit has been revised 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) ~~fifty (50) inch, eight (8) color~~ flexographic printing press, (press #5), known as EU-003, installed in 1999, with a maximum capacity of 43.2 million square inches per hour, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, with a maximum heat input capacity of 0.9 million British thermal units per hour for control of volatile organic compounds, and exhausting through stack 003....

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Printing Presses/Mixing Room

...(c) One (1) ~~fifty (50) inch, eight (8) color~~ flexographic printing press, (press #5), known as EU-003, installed in 1993, with a maximum capacity of 43.2 million square inches per hour, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, with a maximum heat input capacity of 0.9 million British thermal units per hour for control of volatile organic compounds, and exhausting through stack 003....

Comment 2: Condition B.10(a)(3) (Preventive Maintenance Plan) - As a standard practice Printpack maintains a list of replacement parts for oxidizer equipment. Actual inventory may not always conform to the list, particularly when replacement parts have been recently utilized. Depending on market availability, obtaining replacement parts may take weeks and sometimes months (for special order items). Hence please modify this requirement as follows:

Identification and quantification of the replacement parts that should be maintained in inventory for quick replacement.

Response to Comment 2: These changes will not be made because this Condition follows the rule requirements under 326 IAC 1-6-3(a)(3). However, IDEM, OAQ is aware there may be a lapse in time before these parts can be replaced in the inventory.

Comment 3: Condition C.6 (Fugitive Particulate Matter Emission Limitations) - These regulations are not applicable (326 IAC 6-5). Printpack is an insignificant source of particulate emissions, therefore a permit to construct or operate is not required. The requirement to develop a control plan for fugitive PM is not applicable to Printpack's operations. This is also addressed in the TSD.

Response to Comment 3: IDEM, OAQ agrees. Therefore, Condition C.6 will be removed from the permit. The permit has been revised as follows:

~~C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]~~

~~Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), a fugitive particulate matter emissions control plan shall be submitted within ninety (90) days after issuance of this permit.~~

Comment 4: Condition D.1.2 (Volatile Organic Compounds (VOC)) - Please remove this condition from the permit. It is not applicable to Printpack's operations. Per the rule, flexographic printing operations that meet the emission limitations in 326 IAC 8-5-5 are excluded from these regulations. Printpack controls the emissions from the flexographic operations through "an incineration system 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". Otherwise, please add a note to the condition to clarify that Printpack meets the requirements of 326 IAC 8-2-5 by utilizing an incineration system to control the VOC emissions (see TSD document, page 8).

Response to Comment 4: IDEM, OAQ disagrees. The flexographic printing presses are subject to this rule because they perform web coating and have VOC PTE greater than fifteen (15) pounds per day or twenty-five (25) tons per year. Even though they meet the emission limitations set forth in 326 IAC 8-5-5 the flexographic printing operation is not in line with surface coating lines. However, as suggested, for better clarification Condition D.1.2 has been revised as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) Compliance with Condition D.1.1(a) demonstrates compliance with **326 IAC 8-2-5 (Paper Coating Operations)** ~~326 IAC 8-5-5 (Graphic arts operation)~~.

Comment 5: Condition D.1.5 (Volatile Organic Compounds (VOC)) - The current permit language stipulates that emissions from "VOC/HAP input from ink mixing to EU-004" must be estimated at 2% of the VOC/HAP input. This is a gross over-estimation, the potential emissions from ink mixing by EU-004 are less than 5 tons per year of VOC. At this emission rate, process EU-004 should be considered an insignificant source. Please remove the variable "Z" from the equation used to determine compliance with D.1.3. Also, process EU-004 should be eliminated from the Facility Description under Section D.1 (page 26), and added to the list of insignificant activities under Condition A.3 (page 5).

Response to Comment 5: IDEM, OAQ agrees that this will be an insignificant activity based on mass balance data. In order to verify the percent VOC lost from emission unit EU-004, a one time test will be required. This unit, EU-004, will be moved to Condition A.3 and Section D.2 (Insignificant Activities).

Condition A.2(d) (Emission Units and Pollution Control Equipment Summary), section D.1(d) in the Facility Description and Conditions D.1.3(a) and (c) (PSD Minor Limit), D.1.5(b)(1) (Volatile Organic Compounds (VOC)), D.1.8(a)(2) (Record Keeping Requirements), and the Quarterly Report Form for VOCs have been revised to show the removal of emission unit EU-004. The changes are 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:

- ~~... (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.~~
- (e) (d)** One (1) photopolymer plate making system, identified as PH01, with a maximum plate throughput of 52.5 square feet of plates per hour, and exhausting through Stack 005.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Printing Presses/Mixing Room

~~... (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.~~

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

D.1.3 PSD Minor Limit [326 IAC 2-2][326 IAC 2-4.1][40 CFR 63, Subpart KK][40 CFR 63, Subpart JJJJ]

- (a) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, **and revised through this**

Part 70 operating permit, and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall limit the combined VOC emissions from processes EU-001 ~~and EU-002, and EU-004~~ to less than ~~two hundred fifty (250)~~ **two hundred forty-five and eight tenths (245.8)** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (c) The Permittee shall limit the single worst case HAP emissions and combination HAP emissions from processes EU-001, EU-002 ~~and EU-003, and EU-004~~ to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

...

D.1.5 Volatile Organic Compounds (VOC)

...(b) To determine compliance with Condition D.1.3, the Permittee shall apply the following:

- (1) In order to determine compliance with Condition D.1.3, the following equation shall apply:

For EU-001, ~~and EU-002 and EU-004~~

$$[X * (1 - (CE \text{ EU-001} * DE \text{ EU-001}))] + [Y * (1 - (CE \text{ EU-002} * DE \text{ EU-002}))] + [0.02 * Z] = < 250 \text{ tons per year} = < \mathbf{245.8 \text{ tons per year}}$$

Where:

X = VOC/HAP input to EU-001 (tons VOC/HAP per year),
Y = VOC/HAP input to EU-002 (tons VOC/HAP per year), ~~and~~
~~Z = VOC/HAP input from ink mixing to EU-004 (tons VOC/HAP per year)~~

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test.

DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test.

CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test.

DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test.

...

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Tons of VOC/HAP usage from inks, coatings, and press cleaning each month. (this information may be retained in the computerized information management system of the plant);

- (2) The calculated weight of VOC/HAP emitted for each month, from processes EU-001, EU-002, ~~and EU-003 and EU-004~~;

...

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
 Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Part 70 Permit No.: T105-19397-00018
 Facility: EU-001, and EU-002, and EU-004
 Parameter: Volatile Organic Compounds (VOC) Emissions
 Limit: Less than ~~two hundred fifty (250)~~ **two hundred forty-five and eight tenths (245.8)** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	(X) Input VOC EU-001 (tons/month)	(Y) Input VOC EU-002 (tons/month)	(Z) Input VOC EU-004 (tons/month)	(1) tons VOC this Month	(2) tons VOC Previous 11 Months	(3) 12 Month Rolling Total

Emission Calculation Methods:

VOC Emissions This Month:

(1) = $[X * (1 - (CE\ EU-001 * DE\ EU-001))] + [Y * (1 - (CE\ EU-002 * DE\ EU-002))] + [0.02 * Z]$ = tons VOC/month

where:

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test
 DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
 CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test
 DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

Tons VOC From the Previous 11 Months:

(2) = The sum of the values determined for column (1) from the past 11 months.

12 Month Rolling Total:

(3) = (1) + (2)

- 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.

Condition A.3 (Insignificant Activities), section D.2(c) in the Facility Description and condition D.1.2 (Testing Requirements) have been revised to show the addition of emission unit EU-004. The changes are as follows:

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

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

- (c) **One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.**

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Other activities or categories not previously identified:
 - (1) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]
- (c) **One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.**

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

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, a one time compliance test shall be performed to verify the percent VOC lost during mixing from the one (1) ink mix room, identified as EU-004. The test method shall utilize methods as approved by the commissioner. Testing shall be conducted in accordance with Section C – Performance Testing.

Comment 6: Condition D.1.6 (Testing Requirements) - D.1.6(a) -Please add a note to this condition to clarify that Printpack has already performed a test after initial startup. D.1.6(c) - Please change this condition as follows:

The capture efficiency test shall be repeated within 180 days of a fundamental change, which may be indicated by operating parameters, and may include (although it does not necessarily include) any of the following:

- (1) Adding print stations to a press;
- (2) Implementing a fundamental change in the volumetric flow rates from the dryer;
- (3) Changing the set point for the static duct pressure.

Response to Comment 6: For clarification the following revisions have been made to Condition D.1.6. However, D.1.6(c)(1)-(3) will not be changed because this language is verbatim from the technical support document (TSD) for Title V permitting for printing facilities published by the EPA on January 2005.

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

- ~~(a)~~ Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per conditions D.1.1, D.1.2 and D.1.3 for the catalytic oxidizer utilizing methods as approved by the Commissioner.
- ~~(b)~~ (a) The destruction efficiency test **shall be conducted by April 20, 2010** and shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.
- ~~(c)~~ (b) The capture efficiency test shall be repeated within ~~thirty (30)~~ **one hundred eighty (180)** days of a fundamental change, which may be indicated by operating parameters, and may include any of the following:
- (1) Adding print stations to a press;
 - (2) Increasing or decreasing the volumetric flow rate from the dryer;
 - (3) Changing the static duct pressure.

All testing shall be conducted in accordance with Section C - Performance Testing.

Comment 7: Condition D.1.7(a) (Monitoring Requirements) - Please remove the last sentence from this condition. Approved stacks tests have already been performed.

Response to Comment 7: IDEM, OAQ agrees. Condition D.1.7(a) has been revised as follows:

D.1.7 Monitoring Requirements [40 CFR 64.1]

Pursuant to 40 CFR 64.1 (CAM) the owner or operator shall have the following:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. ~~From the date of issuance of this permit until the approved stack test results are available, the~~ **The** Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 550° F for EU-001 and EU-002, and the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 600° F for EU-003 **or the temperature established in the most recent approved stack test.**

Comment 8: Condition D.3.1 (Volatile Organic Compounds (VOC)) - In practice, the sludge waste that will be removed from the photopolymer system will have a negligent VOC (photopolymer solvent) content. Printpack will not deduct this minimal VOC content from the VOC input to determine the emissions from the PH01. Therefore please change this condition as follows:

Pursuant to MSM 105-21593-00018, the VOC input at the one (1) photopolymer plate making system, identified as PH01, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than twenty-five (25) tons per year.

This is also addressed in the TSD.

Response to Comment 8: IDEM, OAQ agrees. Therefore, Condition D.3.1 will be revised in the permit. IDEM, OAQ does not make changes to the TSD. The permit has been revised as follows:

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to MSM 105-21593-00018, the VOC input at the one (1) photopolymer plate making

system, identified as PH01, ~~minus the VOC solvent shipped out as waste or to be recycled~~, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than twenty-five (25) tons per year.

Comment 9: Condition D.3.3 (Volatile Organic Compounds (VOC)) - Please change this condition as follows: *Compliance with the VOC limitation contained in Condition D.3.1 shall be based on the total volatile organic compound input for the previous month, and adding it to the previous eleven (11) month total VOC input, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.*

Response to Comment 9: IDEM, OAQ agrees. Therefore, Condition D.3.3 will be revised in the permit. The permit has been revised as follows:

D.3.3 Volatile Organic Compound (VOC)

~~Compliance with the VOC limitation contained in Condition D.3.1 shall be based on the total volatile organic compound input for the previous month, minus the VOC solvent shipped out, and adding it to the previous eleven (11) month total VOC input, minus the VOC solvent shipped out, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:~~

$$\text{VOC emitted} = VI - SO$$

Where: _____

VI = The total amount of VOC, in tons, input to the processes listed in Condition D.3.1, including coatings, dilution solvents, and cleaning solvents; and

SO = The total amount of VOC, in tons, shipped out as waste or to be recycled, including coatings, dilution solvents, and cleaning solvents, from the processes listed in Condition D.3.1.

Comment 10: Condition D.3.4 (Testing Requirements) - The testing requirements referenced by this condition pertain to the VOC content in coatings and clean-up solvent. The photopolymer system does not utilize coatings or clean-up solvents, therefore these testing methods are not applicable. Also, Printpack will not consider the VOC output (photopolymer solvent waste) from the photopolymer system in determining overall emissions (please see previous comment). Please remove this condition from the permit.

Response to Comment 10: IDEM, OAQ agrees. Therefore, Condition D.3.4 will be removed from the permit. IDEM, OAQ does not make changes to the TSD. The permit has been revised as follows:

~~D.3.4 Testing Requirements [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)][326 IAC 2-2]~~

~~The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled from the one (1) photopolymer plate making system, identified as PH01, and this shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).~~

Comment 11: Condition D.3.5 (Record Keeping Requirements) (Renumbered as D.3.4)- Please modify this condition as follows:

To document compliance with Condition D.3.1, 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 emission limit established in Condition D.3.1. 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 used on a monthly basis. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the amount and type used;*
- (3) *The total VOC input to the process each month; and*
- (4) *The weight of VOCs emitted for each compliance period.*

Response to Comment 11: IDEM, OAQ agrees. Therefore, Condition D.3.5 (Renumbered as D.3.4) will be revised in the permit. The permit has been revised as follows:

~~D.3.5~~ **D.3.4** Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.3.1. 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 a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the amount and type used;
 - ~~(3) The amount of VOC solvent shipped out as waste or to be recycled each month. The amount for solvent shipped out shall be determined based upon the information from the waste collector, and/or source;~~
 - ~~(4)~~ **(3)** The total VOC input to the process each month; and
 - ~~(5)~~ **(4)** The weight of VOCs emitted (~~VOC input, minus the VOC solvent shipped out as waste or to be recycled~~) for each compliance period.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

Comment 12: Part 70 Quarterly Report (page 39) - Please modify the term "Parameter" in the report template as follows:

Parameter: VOC emitted (the total weight of VOC used).

Response to Comment 12: IDEM, OAQ agrees. Therefore, the Part 70 Quarterly Report (page 39) will be revised in the permit. The permit has been revised as follows:

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
 Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
 Part 70 Permit No.: T105-19397-00018
 Facility: PH01
 Parameter: ~~VOC input emitted (the total weight of VOC used), minus the VOC solvent shipped out as waste or to be recycled), VOC emitted = VI-SO~~
 Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

Comment 13: TSD (Federal Rule Applicability –CAM) - Process EU-004 is not vented to a control device, therefore CAM requirements of 40 CFR Part 64 are not applicable. Please remove EU-004 from the list of processes referenced under this applicability determination for the Federal Rule.

Response to Comment 13: Emission unit EU-004 has been removed from the requirements for 40 CFR 64.1 (CAM) under Condition D.1.7 because it does not have VOC emissions greater than one hundred (100) tons per year.

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

1. Cover Page – Signature Block, the branch chief title has been changed to reflect the current branch chief.

Operation Permit No.: T 039-21045-00010	
Issued by: Paul Dubenetzky, Assistant Commissioner Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

2. B.9 (Annual Compliance Certification) – IDEM, OAQ has decided to remove “in letter form” from this condition. Therefore, condition B.9(a) has been revised as follows:

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

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

3. B.12 (Permit Shield) - IDEM, OAQ has decided to remove “in” from the second sentence of this condition. Therefore, condition B.12(a) has been revised as follows:

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 ~~in~~ 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.

4. The following Condition has been added under Compliance Determination in Section 3 of the permit.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.3.1 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

5. Condition C.1 (Particulate Emission Limitations for Process Weight Rates Less Than One Hundred (100) Pounds per Hour) – This condition is federally enforceable. Therefore, the last sentence of Condition C.1 has been removed as follows:

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

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

6. Condition D.2.1 (Particulate Matter (PM)) – Due to typographical errors, the following revisions have been made.

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the bag folding and cutting machines shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

P = process weight rate in tons per hour

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

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

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	303 North Curry Pike, Bloomington, Indiana 47404
County:	Monroe
SIC Code:	2759
Operation Permit No.:	T105-10511-00018
Operation Permit Issuance Date:	April 25, 2000
Permit Renewal No.:	T 105-19397-00018
Permit Reviewer:	Amy Cook

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Printpack, Inc. relating to the operation of a flexographic printing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Three (3) flexographic printing presses (#1, #2, and #3), known as EU-001, installed in 1994, with a maximum capacity of 43.2 million square inches per hour, each, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 001.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, with a maximum capacity of 43.2 million square inches per hour, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, with a maximum heat input capacity of 2.5 million British thermal units per hour, and exhausting through stack 002.
- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, with a maximum capacity of 43.2 million square inches per hour, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, with a maximum heat input capacity of 0.9 million British thermal units per hour for control of volatile organic compounds, and exhausting through stack 003.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, with a maximum capacity of 455 pounds of ink and solvent per hour, and exhausting through stack 004.
- (e) One (1) photopolymer plate making system, identified as PH01, with a maximum plate throughput of 52.5 square feet of plates per hour, and exhausting through Stack 005.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Other activities or categories not previously identified:
 - (1) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]
 - (2) Two (2) solvent storage tanks, with a capacity of 4,000 gallons each, VOC less than three (3) pounds per hour or fifteen (15) pounds per day.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) T 105-10511-00018, issued on April 25, 2000; and
- (b) A 105-14579-00018, issued on August 21, 2001; and
- (c) Reopen 105-13426-00018, issued on February 7, 2002;
- (d) SPM 105-15751-00018, issued on November 20, 2002;
- (e) APPR 105-16875-00018, issued on June 1, 2005;
- (f) MSM 105-21593-00018, issued on September 14, 2005; and
- (g) MPM 105-21623-00018, issued on December 15, 2005

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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 July 28, 2004.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Pages 1 through 7).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on April 25, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Worst Case Single HAP (Glycol Ethers)	Worst Case Combined HAPs
Presses #1-4 and Mixing room (EU-001, EU-002, and EU-004)	0.00	0.00	0.00	Less than 250	0.00	0.00	6.32	8.69
Press # 5 (EU-003)	0.00	0.00	0.00	Less than 250	0.00	0.00	3.11	4.27
Photopolymer plate system (PH01)	0.00	0.00	0.00	Less than 25	0.00	0.00	0.00	0.00
Insignificant Activities	10.0	10.0	0.250	1.00	2.50	3.00	0.00	1.00
Total PTE	10.0	10.0	0.250	Less than 526	2.50	3.00	9.43	13.96

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than or equal to 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 less than or equal to twenty-five (25) tons per year. Therefore, the source is not 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 applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.10
SO ₂	0.01
VOC	120.14
CO	1.08
NO _x	1.29
HAP (specify)	Not Reported

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Monroe County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (c) Monroe County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

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.

Federal Rule Applicability

- (a) This Part 70 operating permit does involve a pollutant-specific emissions unit, identified as EU-001, EU-002, EU-004, and EU-003, as defined in 40 CFR 64.1 for volatile organic compound (VOC):
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC,
 - (2) that is subject to an emission limitation or standard for VOC, and
 - (3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this source.

The pollutant-specific emission unit is a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator has submitted a CAM plan as part of the permit renewal application on July 28, 2004. Monitoring of the pollutant-specific emission unit will be required pursuant to 40 CFR 64 and listed under Compliance Monitoring of this Technical Support Document.

- (b) 40 CFR 60, Subpart Dc – Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
The natural gas-fired combustion sources are not subject to this rule because they have a maximum design heat input capacity of less than ten million (10,000,000) Btu per hour. Therefore, the requirements of 40 CFR 60, Subpart Dc are not included in this permit.
- (c) 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.
The two (2) insignificant solvent storage tanks with a capacity of 4,000 gallons each are not subject to this rule because both storage tanks have capacities less than 75 cubic meters (19,813 gallons). Therefore, the requirements of 40 CFR 60, Kb are not included in this permit.
- (d) 40 CFR 60, Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing.

This source is not subject to this rule because all presses are flexographic and not publication rotogravure printing presses. Therefore, the requirements of 40 CFR 60, Subpart QQ are not included in this permit.

- (e) 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning. The one (1) photopolymer plate making system is not subject to this rule because it does not use any halogenated solvents. Therefore, the requirements of 40 CFR 63, Subpart T are not included in this permit.
- (f) 40 CFR 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry.
This source is not subject to this rule because any single HAP emissions and combination HAP emissions from processes EU-001, EU-002, EU-003, and EU-004 are limited to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 40 CFR 63, Subpart KK are not included in this permit.
- (g) 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.
This source is not subject to this rule because any single HAP emissions and combination HAP emissions from processes EU-001, EU-002, EU-003, and EU-004 are limited to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 40 CFR 63, Subpart JJJJ are not included in this permit.
- (h) 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters.
This source is not subject to this rule because the source-wide HAPs emissions are controlled and limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD are not included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1994 and it is not one of the 28 listed source categories. The potential to emit (PTE) of volatile organic compound (VOC) is greater than two hundred fifty (250) tons per year, which makes this a major source of VOC. However, the source has taken limits on VOC emissions in order to avoid the requirements of 326 IAC 2-2 (PSD). Pursuant to CP 105-3447-00018, issued on June 3, 1994, EU-001 and EU-004 was limited to 192.7 tons per year of VOC. There were no limits for EU-002 under CP 105-4805-00018, issued on March 5, 1996. Pursuant to T 105-10511-00018, issued on April 25, 2000, limits were put on EU-001, EU-002 and EU-004 of less than two hundred fifty (250)tons per year of VOC and a limit was put on EU-003 of two hundred sixteen (216) tons per year of VOC, which made this source a major source for PSD. The Appeal resolution 105-16875-00018 ,issued on June 1, 2005, limited EU-001, EU-002 and EU-004, and revised the limit for EU-003. The requirement for 90% destruction efficiency comes from the Appeal resolution 105-16875-00018, issued on June 1, 2005. The limits are as follows:

- (a) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, the Permittee shall limit the combined VOC emissions from processes EU-001, EU-002, and EU-004 to less than two hundred fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) Pursuant to APPR 105-16875-00018, issued on June 1, 2005, the Permittee shall limit the VOC emissions from process EU-003 to less than 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The Permittee shall maintain a minimum destruction efficiency of 90% and a capture efficiency as determined by the most recent stack test.
- (d) Pursuant to MSM 105-21593-00018, issued on September 14, 2005, the VOC input at the one (1) photopolymer plate making system, identified as PH01, minus the solvent shipped out as waste or to be recycled, shall be limited to less than twenty-five (25) tons per year.

Compliance with the above limits is achieved through the requirements of Condition D.1.5.

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

This source is not subject to this rule because any single HAP emissions and combination HAP emissions from processes EU-001, EU-002, EU-003, and EU-004 are limited to less than ten (10) tons for a single HAP and less than twenty-five (25) tons for a combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has the potential to emit greater than two hundred fifty (250) tons per year of volatile organic compound (VOC); therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5-1(b) (Fugitive Particulate Matter Emission Limitations)

This source is subject to this rule because it is a new source of particulate matter (PM) which did not receive all necessary preconstruction approvals before December 13, 1985, it is located in Monroe county, and it requires a permit as set forth in 326 IAC 2. Therefore, pursuant to 326 IAC 6-5-3(a) (Submission of Control Plan), the source shall submit a fugitive particulate matter emissions control plan or request an exemption from the control plan within six (6) months following December 13, 1985. The source has not submitted a particulate matter emissions control plan, therefore one must be submitted within ninety (90) days after issuance of this permit.

State Rule Applicability – Individual Facilities

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

The five (5) flexographic printing presses, identified as EU-001, EU-002, and EU-003 are regulated by 326 IAC 8-5-5 and the one (1) photopolymer plate making system, identified as PH01, is regulated by 326 IAC 8-3-2. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

326 IAC 8-2-5 (Paper Coating Operations)

This rule applies to each of the five (5) flexographic printing presses because they are web coaters. Therefore, the Permittee shall not allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line. Compliance with this rule is demonstrated through 326 IAC 8-5-5 (Graphic Arts Operation). Compliance with 326 IAC 2-2 (PSD) demonstrates compliance with 326 IAC 8-2-5 (Paper Coating Operations).

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

This rule applies to each of the five (5) flexographic printing presses because they were all constructed after the November 1, 1980 applicability date and they each have a potential to emit greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-5-5, the following shall apply:

- (a) The processes EU-001 (presses #1 - #3), EU-002 (press #4), and EU-003 (press #5) shall use a VOC capture system sufficient to achieve an overall control efficiency of at least 60%, in conjunction with the emission control system, and;
- (b) The oxidation system shall maintain a minimum destruction efficiency of 90%.

The five (5) presses are in compliance with this rule since the catalytic oxidizers with capture efficiencies of seventy (70), seventy-one (71), and eighty (80) percent combined with destruction efficiencies of ninety-seven (97), ninety-nine and three tenths (99.3), and ninety-seven (97) percent, for overall control efficiencies of sixty-seven and nine tenths (67.9), seventy and five tenths (70.5), and seventy-seven and six tenths (77.6) percent, respectively, satisfy the requirements of this rule which requires an overall sixty (60) percent control efficiency for each oxidizer.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 1-2-18.5, "Cold cleaner degreaser" means a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article. Since the solvent is used to clean the plates, this unit is considered a cold cleaner degreaser. Therefore, the photopolymer plate making system is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations). Pursuant to 326 IAC 8-3-2, 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 operating requirements; and

- (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 Degreaser Operation and Control)

The one (1) photopolymer plate making system, identified as PH01, which was constructed after July 1, 1990, does not have a remote solvent reservoir. Therefore the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) are not applicable.

State Rule Applicability – Insignificant Activities

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

This source is located in Monroe County. The natural gas-fired combustion sources are not subject to this rule because they are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) are not applicable.

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

Pursuant to 326 IAC 6-3-2 the particulate from the bag folding and cutting machines shall be limited by the following:

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

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

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The two (2) solvent storage tanks are not subject to this rule because they were constructed after the January 1, 1980 applicability date. Therefore, the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) are not applicable.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

The two (2) solvent storage tanks are not subject to this rule because they are located in Monroe County which is not one of the affected counties listed in this rule. Therefore, the requirements of 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels) are not applicable.

Testing Requirements

- (a) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per 326 IAC 2-2 (PSD), 326 IAC 8-5-5 (Graphic Arts Operation), and 326 IAC 8-2-5 (Paper Coating Operations), for the catalytic oxidizer utilizing methods as approved by the Commissioner.
- (b) The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.
- (c) The capture efficiency test shall be repeated within thirty (30) days of a fundamental change, which may be indicated by operating parameters, and may include any of the following:
 - (1) Adding print stations to a press;
 - (2) Increasing or decreasing the volumetric flow rate from the dryer;
 - (3) Changing the static duct pressure.

- (d) The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled from the one (1) photopolymer plate making system, identified as PH01, and this shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).

All testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The five (5) printing presses, identified as EU-001, EU-002, and EU-003, have applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 550° F for EU-001 and EU-002, and the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 600° F for EU-003.
 - (1) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in 326 IAC 2-2 (PSD), as approved by IDEM.
 - (2) On and after the date the approved stack results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.
 - (b) Pressure sensor(s) on the capture system(s) main trunk line(s) for monitoring pressure of the system(s) plus appropriately located pressure transducer(s) and continuous pressure recorder(s).

- (c) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation at all times when the printing presses are operated.

- (d) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspections and repair, as necessary, of flexible press hoses and fan motor belt;
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (4) Monthly visual inspections of rooftop ductwork;
 - (5) Annual flow direction (i.e., "smoke") tests; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established duct pressure range.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP).

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 325 IAC 8-2-5 (Paper Coating Operations), 326 IAC 2-2 (PSD), and 40 CFR 64.1 (CAM).

Conclusion

The operation of this flexographic printing source shall be subject to the conditions of this Part 70 permit T 105-19397-00018.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Printpack, Inc.
 Address City IN Zip: 303 N. Curry Pike, Bloomington, IN 47404
 Part 70: T 105-19397-00018
 Plt ID: 105-00018
 Reviewer: Amy Cook
 Date: January 31, 2006

THROUGHPUT								
Emission Unit	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YR	MMin^2/HR
EU-001 (Presses #1-3)								
#1 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2
#2 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2
#3 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
EU-001 (Presses #1-3)	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
Worst Case Ink						
#1 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
#2 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
#3 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
Diluent & Clean-up Solvents	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
Worst Case Solvent (S-215)	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
#1 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3
#2 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3
#3 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3

EU-001	Subtotal	1574	tons/yr
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*VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Catalytic oxidizer 70% capture and 97% destruction = 67.9% overall control

	Control Efficiency VOC	Controlled VOC tons/yr
EU-001	0.679	505
Subtotal	0.679	505
		Controlled Emissions

THROUGHPUT								
Emission Unit								
EU-002 (Press #4)	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YR	MMin ² /HR
#4 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name Press ID	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Worst Case Ink						
#4 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
Diluent & Clean-up Solvents Worst Case Solvent (S-215)	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off %	Through Put MMin ² /YR	Tons 2000 lbs	Tons Year
#4 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3

Total VOC	525	tons/yr
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*VOC = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Catalytic oxidizer 71% capture and 99.3% destruction = 70.5% overall control

Control Efficiency VOC	Controlled VOC tons/yr
0.705	
155 Controlled Emissions	

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

THROUGHPUT								
Emission Unit								
EU-004 (Press #5)	MAXIMUM LINE SPEED	CONVERT FEET TO	MAXIMUM PRINT	60 MIN	8760 HR	1/1000000	MMin^2/YR	MMin^2/HR
	FEET PER MINUTE	INCHES	WIDTH INCHES	HOUR	YEAR			
#5 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
Press ID	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
Worst Case Ink						
#5 W&H Flexographic	6.1	70%	100.00%	378432	2000	808.0
Solvents 301 or 302	5.1	100%	100.00%	378432	2000	965.0
Cut Ink includes Solvent	5.6	73%	100.00%	378432	2000	773.5

Total VOC	965	tons/yr
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*VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Catalytic oxidizer 80% capture and 97% destruction = 77.6% overall control

Control Efficiency	Controlled
VOC	VOC
0.776	tons/yr
	216 Controlled Emissions

74.1 % Minimum overall efficiency to avoid applicability of 326 IAC 2-2 (250 tons per year) for EU-004 (Press 5)

0.741	tons/yr
	250 Controlled Emissions

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

EU-003 (Ink Mixing Room)	Press #1	Press #2	Press #3	Press #4	Press #5	Presses #1-5	
Inks	692531	692531	692531	692531	692531	3462655	lbs/yr
Solvents	650903	650903	650903	650903	650903	3254515	lbs/yr

50% of inks mixed in mixing room and 100% of solvents mixed in mixing room 4985842.5 lbs/yr

US EPA AP-42 VOC Emission Factor = 2% For Mixing Losses

Potential VOC Emissions	lbs/yr	tons/yr
	99717	49.9

Limited Input of 91 lbs/h 398.58 tons/year = 8.0 tons/yr of VOC

HAP Emission Calculations

Company Name: Printpack, Inc.
 Address City IN Zip: 303 N. Curry Pike, Bloomington, IN 47404
 Part 70: T 105-19397-00018
 Plt ID: 105-00018
 Reviewer: Amy Cook
 Date: January 31, 2006

EU-001 (Presses #1-3) Print rate = 43.2 MM in^2/hr, each

Material Presses: #1-3 W&H Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
Inks										
Slow Dry White #1	11.09	0.165	129.6	1.00	4.00%	0.00%			41.55	0.00
Slow Dry White #2	11.1	0.165	129.6	1.00	4.00%	0.00%			41.59	0.00
Orange Base	7.60	0.241	129.6	1.00	0.00%	1.50%			0.00	15.60
Madras Orange	7.60	0.241	129.6	1.00	0.00%	1.50%			0.00	15.60
Sunshen Red	7.50	0.244	129.6	1.00	0.00%	1.00%			0.00	10.39
Panatone 186	7.70	0.238	129.6	1.00	0.00%	1.00%			0.00	10.40
Rubine Red	7.70	0.238	129.6	1.00	0.00%	1.00%			0.00	10.40
Reflex Blue	7.65	0.239	129.6	1.00	0.00%	1.00%			0.00	10.38
Cyan Blue	7.50	0.244	129.6	1.00	0.00%	1.00%			0.00	10.39
Green	7.60	0.241	129.6	1.00	0.00%	1.00%			0.00	10.40
Subtotal Before Controls Worst Case ink and solvent subtotal									41.59	15.60

Total Potential Emissions	Subtotal Worst case ink and solvent Control efficiency =	67.90%	TOTALS:	(tons/yr):	13.3	5.0
				(lbs/hr):	3.05	1.14

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Flash-off

EU-002 (Press #4) Print rate = 43.2 MM in²/hr

Material Presses: #4 W&H Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
Inks										
Slow Dry White #1	11.09	0.165	43.2	1.00	4.00%	0.00%			13.85	0.00
Slow Dry White #2	11.1	0.165	43.2	1.00	4.00%	0.00%			13.86	0.00
Orange Base	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Madras Orange	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Sunshen Red	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Panatone 186	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Rubine Red	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Reflex Blue	7.65	0.239	43.2	1.00	0.00%	1.00%			0.00	3.46
Cyan Blue	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Green	7.60	0.241	43.2	1.00	0.00%	1.00%			0.00	3.47
Subtotal Before Controls Worst Case ink and solvent subtotal									13.86	5.20

Total Potential Emissions	Subtotal Worst case ink and solvent	Control efficiency =	70.50%	TOTAL:	(tons/yr):	4.09	1.53
					(lbs/hr):	0.93	0.350

EU-004 (Press #5) Print rate = 43.2 MM in²/hr

Material Presses: #5 Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
Inks										
Slow Dry White #1	11.09	0.165	43.2	1.00	4.00%	0.00%			13.85	0.00
Slow Dry White #2	11.1	0.165	43.2	1.00	4.00%	0.00%			13.86	0.00
Orange Base	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Madras Orange	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Sunshen Red	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Panatone 186	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Rubine Red	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Reflex Blue	7.65	0.239	43.2	1.00	0.00%	1.00%			0.00	3.46
Cyan Blue	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Green	7.60	0.241	43.2	1.00	0.00%	1.00%			0.00	3.47
Subtotal Before Controls Worst Case ink and solvent subtotal									13.86	5.20

Total Potential Emissions	Subtotal Worst case ink and solvent	Control efficiency =	77.60%	TOTAL:	(tons/yr):	3.11	1.16
					(lbs/hr):	0.71	0.266

Summary

Press #	Before Control	Before Control	After Control	After Control	
	Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)	
1-3	41.59	15.60	13.35	5.01	
4	13.86	5.20	4.09	1.53	
5	13.86	5.20	3.11	1.16	
Total	Press # 1-5	69.31	25.99	20.54	7.70

Limited by Ratio of Presses 1-4 VOC of $250/(535+155) = 250/690$ * each HAP, therefore

Limited and Controlled HAPs for Presses 1-4 are <	6.32	2.37
Total Limited and Controlled HAPS for Presses 1-5 are <	9.42	3.53

**Appendix A: Emissions Calculations
VOC and Particulate
From Photopolymer Plate Making**

**Company Name: Printpack, Inc.
Address City IN Zip: 303 N. Curry Pike, Bloomington, IN 47404
Permit Number: 105-19397-00018
Pit ID: 105-00018
Reviewer: Amy Cook
Application Date: January 31, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. Used (gal/sq ft)*	Maximum (sq ft/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	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Optisol washout/rinse**	7.1	100.000%	0.0%	100.0%	0.0%	0.00%	0.02500	52.500	7.09	7.09	9.31	223	40.8	0.00	n/a	100%

*Gallons of material used is 0.25 x the percent not recycled (10%). The percent recycled was provided by the manufacturer.

PM Control Efficiency:

0.00%

**There are no HAPs in this material.

Uncontrolled	9.31	223	40.8	0.00
Controlled	9.31	223	40.8	0.00

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