INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: May 2, 2005

RE: Bemis Company, Inc. / PSD/SSM 167-19667-00033

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05

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Mr. Brian Wells
Bemis Company
1350 North Fruitridge Avenue
Terre Haute, Indiana 47805

May 2, 2005

Re: 167-19667-00033
PSD/Significant Source Modification to:
Part 70 permit No.: T167-6182-00033

Dear Mr. Wells:

Bemis Company was issued Part 70 operating permit T167-6182-00033 on June 28, 2004 for a stationary polyethylene film production, printing, and converting source. An application to modify the source was received on October 1, 2004. A significant source modification, pursuant to 326 IAC 2-7-10.5 will be issued, since the following existing emission units are subject to 326 IAC 2-2:

(a) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

(b) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

Four (4) Catalytic Oxidizers identified as I1 through I4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are each capable of controlling Press #11, Press #12, and existing Presses #13 through #18.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Vigo County
Vigo County Health Department
Vigo County Air Pollution Control
Air Compliance Section Inspector – Jennifer Dorn
Compliance Data Section
Administrative and Development

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Part 70 PSD/SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY and VIGO COUNTY AIR POLLUTION CONTROL

Bemis Company, Inc.
1350 North Fruitridge Avenue
Terre Haute, Indiana 47804

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

PSD/Significant Source Modification No.: 167-19667-00033	
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: May 2, 2005

SECTION D.5 FACILITY OPERATION CONDITIONS

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

(a) Flexographic printing press, identified as Press #11, using Catalytic Oxidation for control and exhausting to stacks 1, 2, 3, and /or 4;

(b) Flexographic printing press, identified as Press #12, using Catalytic Oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr), are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.

(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.

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

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

D.5.1 Prevention of Significant Deterioration – Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the PSD BACT for Bemis Company shall be the following:

(a) Whenever Press #11 or Press #12 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.

(b) The capture efficiency system for Presses #11 and #12 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:

(1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.

(2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.

(3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

(4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.

(5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.

(6) All VOC in the enclosure emissions must be captured and contained for

discharge through its respective control system.

Where:
Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

Compliance with this condition shall satisfy the requirements of 326 IAC 2-2, Prevention of Significant Deterioration.

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

(a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for flexographic printer identified as Press #11 and Press #12 in conjunction with the catalytic oxidation systems shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.

(b) Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks for flexographic printer identified as Presses #11 and #12 the incineration systems shall maintain a minimum of 90% destruction efficiency.

D.5.3 Clean Units [326 IAC 2-2.2]

(a) Pursuant to 326 IAC 2-2.2, Press #11 and Press #12 are designated as Clean Units for volatile organic compounds (VOC) emissions.

(b) The Clean Unit designation for Press #11 and Press #12 shall be in effect for ten (10) years from the date this PSD Permit No.: 167-19667-00033 is issued.

(c) In order to maintain the Clean Unit designation for Press #11 and Press #12:

(1) the Permittee shall comply with the PSD BACT limit established for these presses and their VOC control systems found in Condition D.5.1.

(2) no physical change or change in the method of operation shall be made for Press #11 and Press #12 that will allow them to be operated in a manner that is inconsistent with their original physical or operational characteristic.

(3) the Permittee shall not replace the specific air pollution control technology with one that has a lower control efficiency than the original control that was established as BACT.

(d) Any project at these presses for which actual construction begins after the effective date and before the expiration date of the clean units designation shall be considered to have occurred while the emissions units were clean units.

(e) If a project at these emission units does not cause the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT and the project would not alter any physical or operational characteristics that formed the basis for the BACT determination, the clean unit designations remain unchanged.

(f) If a project causes the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT or the project would alter any

physical or operational characteristics that formed the basis for the BACT determination, then the clean unit designations shall expire upon issuance of the necessary permit modifications, unless the units requalify as clean units. If the Permittee begins actual construction on the project without first applying to modify the emissions unit's permit, the clean unit designations shall expire immediately prior to the time when actual construction of this project begins.

(g) The Emission limits required for Press #11 and Press #12 in conjunction with the PSD BACT shall stay the same upon expiration of the Clean Unit designation.

(h) A change that causes emission units to lose their clean unit designation shall be subject to the applicability requirements of 326 IAC 2-2-2(d)(1) through 326 IAC 2-2-2(d)(4) and 326 IAC 2-2-2(d)(6).

D.5.4 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 these facilities and their control devices.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within sixty days (60) after the issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency and the total enclosure as per Condition D.5.1 for the Catalytic Oxidizers utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.5.6 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12. For the purpose of this condition, continuous means no less than once per minute. 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 take appropriate response steps in accordance with Part 70 Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of any catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12 Catalytic Oxidizers is below 550 ^{o}F. A three (3) hour average temperature that is below 550 ^{o}F is not a deviation from this permit. Failure to take response steps in accordance with Part 70 Section C – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

(b) 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.5.1, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.5.7 Parametric Monitoring

(a) The Permittee shall determine the appropriate permanent total enclosure monitoring parameter and value (duct pressure, or fan amperage or differential pressure**)** from the most recent performance test that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM.

(b) The established permanent total enclosure monitoring parameter and value (duct pressure, or fan amperage or differential pressure) shall be observed at least once per day when Press #11 and Press #12 Catalytic Oxidizers are in operation. On and after the date the approved compliance demonstration results are available, the permanent total enclosure monitoring parameter shall be maintained within the normal range as established in most recent performance test.

Compliance Monitoring Requirements

D.5.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, Presses #11 and #12 are subject to CAM. Since these presses do not have a PTE after controls at major source significant levels, the CAM plan for these presses shall be submitted as part of the Part 70 permit renewal application.

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

D.5.9 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below.

(1) The continuous temperature records (reduced to a three-hour average basis) for the Press #11 and Press #12 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Daily record of the duct pressure, or fan amperage or differential pressure.

(b) To document compliance with Condition D.5.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

Indiana Department of Environmental Management
Office of Air Quality
and Vigo County Air Pollution Control

Technical Support Document (TSD) for a PSD/Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Bemis Company
Source Location:	1350 North Fruitridge Ave., Terre Haute, Indiana 47805
County:	Vigo
SIC Code:	2673, 3081, and 3079
Operation Permit No.:	T167-6182-00033
Operation Permit Issuance Date:	June 28, 2004
PSD Significant Source Modification No.:	SSM 167-19667-00033
Significant Permit Modification No.:	SPM 167-19669-00033
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Bemis Company relating to the operation of the following existing flexographic presses:

(a) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

(b) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.
(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)

History

Press #11 and Press #12 were issued a permit in May 27, 1986 (CP not numbered) and installed in 1986. Originally, a netting analysis was performed to avoid major review under Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR Part 52.21. Through this netting analysis, each press was limited to 33.12 tons per year. These individual limits were then later combined to 66.24 tons of VOC per year.
Information taken from the 1st and 2nd paragraph page 17 of 29 TSD of the issued Part 70 167-

6182-00033 shows that presses #11 and #12 exceeded their 66.24 tons per year VOC limit in the year 1996 and 1997. Please see table for actual emissions from these presses.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	**1996**	**1997**	1998	1999	2000	2001	2002
Press #11	22.3	19.8	19.8	**44.9**	**44.2**	26.0	31.7	19.3	22.9	25.4
Press #12	22.3	19.1	19.1	**37.5**	**36.4**	22.3	31.7	19.6	23.8	22.9
Total	44.6	38.9	38.9	**82.4**	**80.6**	48.3	63.4	38.9	46.7	48.3

Due to this exceedance of the VOC limit, Bemis Company violated the PSD rules, 326 IAC 2-2 and 40 CFR Part 52.21(r)(4). Based on the USEPA Injunctive Relief Guidance, Press #11 and Press #12 which violated PSD requirements should now have to undergo a major NSR review and whatever technology is BACT at the time of the major NSR review should be the BACT required for these presses.

Bemis Company submitted a PSD application to the OAQ to address the PSD violation on October 1, 2004.

Existing Approvals

Bemis Company has been issued a Part 70 permit T167-6182-00033 on June 28, 2004, and has not been modified since.

Enforcement Issue

There is an enforcement action pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S1	Presses #11, #12	50	1.4	7,000	350
S2	Presses #11, #12	50	1.4	7,000	350
S3	Presses #11, #12	50	1.4	7,000	350
S4	Presses #11, #12	50	1.4	7,000	350

Note: Although this stack information is only for new emission units, this information is necessary for these existing presses for the purpose of doing air modeling.

Recommendation

The staff recommends to the Commissioner that the Significant Source or Significant Permit Modificatio**n** be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 1, 2004.

Emission Calculations

Potential to emit calculation for these existing Presses #11 and #12 was claimed confidential.

Justification for the Permit Modification

(a) Press #11 was originally limited to 33.12 tons of VOC per year and Press #12 was also limited to 33.12 tons of VOC per year to avoid a major NSR review under PSD requirements. Later on, these limits were combined into a total VOC limit of 66.24 tons per year. Since the 66.24 tons per year limit was exceeded the presses have violated the PSD requirements under 326 IAC 2-2 and 40 CFR Part 52.21(r)(4). Therefore, these presses are subject to 326 IAC 2-2, Prevention of Significant Deterioration requirements and Significant Source Modification under 326 IAC 2-7-10.5.

It was decided that these Presses #11 and #12 will go through PSD review under 326 IAC 2-2, instead of Emissions Offset, 326 IAC 2-3 since the violation occurred when the county was designated as attainment for ozone.

(b) The modification is subject to a Significant Permit Modification under 326 IAC 2-7-11(d), as it involves significant changes to the monitoring, recordkeeping, and reporting permit terms or conditions.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	NA
PM-10	less than 1
SO_2	less than 1
VOC	1828
CO	less than 5
NO_x	less than 25

This exising source is a major stationary source because VOC, a non-attainment pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

Potential to Emit of Modification After Issuance

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

	Limited Potential to Emit (tons/year)						
Process/Facility	PM	PM10	SO2	VOC	CO	NOx	HAPs
Presses #11 & #12 after modification	-	-	-	28.65	-	-	-
Existing Source PTE excluding Presses #11 & #12 after modification	-	< 1	< 1	1761.76		< 25	
TOTAL Source PTE after modification				1790.41			

The PSD review was performed not on the basis of the VOC emissions after control (28.65 tons/year), which is below 40 tons per year (significant level), but because these presses exceeded their VOC limit, thus violating 326 IAC 2-2 and 40 CFR Part 52.21(r)(4). Therefore, the modification will require major NSR review.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
PM	attainment
SO_2	Maintenance/attainment
NO_2	attainment
8-hour Ozone	non-attainment
1-hour ozone	attainment
CO	attainment
Lead	Not determined

(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 the ozone standards. Vigo County has been designated as non-attainment for the 8-hour ozone standards. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Vigo County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

(a) 326 IAC 12, (40 CFR 60.430), Subpart QQ – Standards of Performance for the Graphic Arts Industry. This rule applies specifically to publication rotogravure printing. Presses #11 and #12 are not subject to this NSPS, as they are flexographic printing presses.

(b) 326 IAC 14, (40 CFR Part 63.820, Subpart KK – National Emission Standards for the Printing and Publishing Industry. This applies to publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses. Presses #11 and #12 wide-web flexographic printing presses as defined under Subpart KK. However, because the source is not major source of HAPs, the source is only subject to minor recordkeeping and reporting requirements as necessary to demonstrate area source status.

(c) 40 CFR Part 64, Compliance Assurance Monitoring
The CAM is applicable to specific emission unit based on individual pollutant, and must meet all of the following criteria:

(1) The emission unit must be located at a major source for which a Part 70 permit is required.
(2) Be subject to an emission limitation or standard.
(3) Use a control device to achieve compliance.
(4) Have potential precontrol emissions of at least 100 percent of the major source thresholds.

(A) Presses #11 and #12 meet all the above criteria and therefore, are subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring.

(B) Emission units with the PTE of a regulated air pollutant equal to or greater than the major source threshold before controls, but less than the major source thresholds after control will be required to submit a CAM Plan with the Part 70 permit renewal application.

Although, Presses #11 and #12 are subject to PSD review, their PTE after controls are less than the significant levels. They are subject to PSD due to violation of the PSD requirements under 326 IAC 2-2 and 40 CFR Part 52.21(r)(4). Since their PTE after controls are less than the significant levels, the CAM for these presses shall be submitted as part of the Part 70 permit renewal application.

State Rule Applicability - Entire Source

(a) 326 IAC 2-2 (Prevention of Significant Deterioration)
Press #11 was originally limited to 33.12 tons of VOC per year and Press #12 was also limited to 33.12 tons of VOC per year to avoid a major NSR review under PSD requirements. Later on these limits were combined into a total VOC limit of 66.24 tons per year. In 1996 and 1997 the 66.24 tons per year limit for these presses was exceeded when the catalytic oxidation system was not operated during the ozone season and therefore, violated the PSD requirements under 326 IAC 2-2 and 40 CFR Part 52.21(r)(4).

(b) 326 IAC 2-2-3 (PSD Rule: Control Technology Review Requirements)
Based on the USEPA Injunctive Relief Guidance, Press #11 and Press #12 which violated PSD requirements should now have to undergo a major NSR review and whatever technology is BACT at the time of the major NSR review should be the BACT required for these presses.

(1) The BACT/LAER analysis submitted by Bemis Company, Inc. was verified by IDEM, OAQ, through the review of the various control technologies listed in the USEPA BACT/RACT/LAER Clearinghouse which lists the following:

BACT/LAER ESTABLISHED FOR FLEXOGRAPHIC PRINTING OPERATIONS AS COMPARED TO BEMIS COMPANY, INC.

Company Name/Year Permitted	Operation	Limit	Control Technology
Proposed BACT for Bemis Company, Inc. – Terre Haute, Indiana	Flexographic Printing Presses #11 and #12	None	Existing Catalytic Oxidation System with capture system of 100% and 95% destruction efficiency
C-P Converters – Pennsylvania 01/09/2003	Flexographic Printer	24 tons/yr	Catalytic Incinerator – 100% permanent total enclosure, 95% destruction efficiency
Pechiney Plastic Packaging – Wisconsin 09/25/2002	Flexographic Press	5% of total mass of VOC	Catalytic or Regenerative Themal Oxidizer - 100% permanent total enclosure, 95% destruction efficiency
Curwood, Inc. – Wisconsin 06/11/2002	Flexographic Press	19.6 lbs/hr	Catalytic Oxidizer – 100% capture of the permanent total enclosure, 95% destruction efficiency
American Packaging Corporation - Iowa	Flexographic Press	0.041 lb of VOC/lb materials	Thermal Oxidizers – 100% capture 95% destruction
Bemis Films – BSF Facility Wisconsin 06/01/2001	Flexographic Press	5% of total mass VOC	Catalytic Oxidizer – 100 % capture of the permanent total enclosure, 95% destruction efficiency
International Paper -Michigan	Flexographic Press	1.04 lb VOC/lb solids	No control
Millprint, Inc. – Wisconsin 06/02/1999	Flexographic Press	Can't find it anymore in the RLBC data base	*Catalytic Oxidizer – 100% total enclosure, 95% destruction
Bemis Films – Wisconsin 04/20/98	Flexographic Press	17.3 lb/hr	Catalytic Oxidizer – total enclosure of control impression section of the flexographic press, 95% destruction

*Millprint, Inc. – The USEPA BACT/RACT/LAER Clearinghouse shows 99% destruction efficiency. IDEM has verified this number to the source contact (Howard Hofmeister –(920) 303-7417), and it should be 95%.

The most stringent BACT/LAER found for flexographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse is a press with 100% capture

efficiency and the use of a catalytic oxidizer with 95% destruction efficiency, and a VOC emission limit of 5% total mass of VOC or 0.041 lb of VOC/lb materials.

(2) IDEM, OAQ has made further search for similar operations that control VOC emissions. The RBLC Clearinghouse and few permits issued by the agency for rotogravures control the VOC emissions using thermal oxidation system with 98% destruction efficiency and 100% capture efficiency. Based on these findings, Bemis Company was required to evaluate if 98% destruction efficiency is feasible to achieve by their current VOC controls.

Historical destruction efficiency tests performed on thirty-seven (37) of the catalytic and regenerative thermal oxidizers within Bemis flexible packaging plants show that the extreme variability of the VOC in Bemis air stream resulted in different efficiency levels in the destruction, ranging from an average of 91.8% to 99.9%. Therefore, 98% destruction efficiency is not technically feasible for Bemis Press #11 and Press #12, since it cannot be continuously achieved due to this extreme variability of the VOC.

Conclusion: Bemis Company's existing catalytic oxidizers at 95% destruction efficiency and 100% capture, fit the most stringent BACT for flexographic operation, therefore, no cost analysis is necessary.

Best Available Control Technology (BACT)

The PSD BACT determined for Bemis Company is the following:

(1) Whenever Press #11 or Press #12 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.

(2) Performance testing to verify VOC control efficiency of the catalytic oxidizers.

(3) Continuous monitoring of the catalytic oxidizers operating temperature.

(4) Record Keeping of the continuous temperature (on a three- hour average basis) for the thermal oxidizers and the three- hour average temperature used to demonstrate compliance during the most recent compliant stack test, and daily records of the duct pressure or fan amperage.

(5) The capture efficiency system for Presses #11 and #12 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:

(A) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.

(B) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.

(C) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

(D) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.

(E) All access doors and windows whose areas are not included in (C) and are not included in the calculation in (D) shall be closed during routine operation of the process.

(F) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:
Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

(c) 326 IAC 2-2-4 (PSD Rule: Air Quality Analysis Requirements)
Section (a) of this rule states that "any application for a permit under the provisions of this rule shall contain an analysis of ambient air quality in the area that the major modification would affect for each of the pollutant:

(1) For a modification, each regulated NSR pollutant for which the modification would result in a significant emission increase.

Since Presses #11 and #12 violated PSD requirements under 326 IAC 2-2 and 40 CFR Part 52.21(r)(4) by emitting greater than the applicable VOC limit, these presses are subject to PSD review and air quality analysis will be required.

IDEM, OAQ did not do an air modeling for these presses, as it is not necessary since the VOC emissions after controls are below the IDEM's non-attainment modeling threshold of 100 tons per year.

(d) 326 2-2-5 (PSD Rule: Air Quality Impact Requirements)
Section (a) of this rule states that the owner or operator of the proposed major modification shall demonstrate that allowable emissions increases in conjunction with all applicable emissions increases or reductions (including secondary emissions) will not cause or contribute to air pollution in violation of any:

(1) ambient air quality standard, as designated in 326 IAC 1-3, in any air quality control region; or

(2) applicable maximum allowable increase over the baseline concentration in any area as described in section 6 of this rule.

Section (e) of this rule states that air quality impact analysis required shall be conducted

in accordance with the following provisions:

(1) Any estimates of ambient air concentrations used in the demonstration processes required shall be based upon the applicable air quality models, data bases, and other requirements specified in 40 CFR Part 51, Appendix W (Requirements for Preparation, Adoption, and Submittal of Implementation Plans, Guideline on Air Quality Models).

(2) Where an air quality impact model specified in the guidelines cited in (1) is inappropriate, a model maybe modified or another model substituted provided that all applicable guidelines are satisfied.

(3) Modifications or substitution of any model may only be done in accordance with guideline documents and with written approval from U.S. EPA and shall be subject to public comment procedures set forth in 326 IAC 2-1.1-6.

This modification does not result in a non-attainment incremental consumption that will cause significant degradation of the air quality in the area, since there is a net decrease in the allowable VOC emissions.

(e) 326 IAC 2-2-12 (PSD RulePermit Rescission)
The PSD permit or the source modification permit shall remain in effect unless it is rescinded, modified, revoked or expires.

(f) 326 IAC 2-2.2-1 (Clean Unit)

(A) Press #11 and Press #2 are designated as Clean Units, pursuant to 326 IAC 2-2.2 because:

(1) they are being permitted under 326 IAC 2-2, Prevention of Significant Deterioration;

(2) their control technology achieves BACT level of emission reduction as determined through the issuance of the PSD permit; and

(3) the owner or operator made an investment to install the control technology.

(B) Since these presses are existing emission units that requalify for the clean unit designation using existing control technology, the effective date of the Clean Unit designation for Press #11 and Press #2 is for ten (10) years from the date this PSD Permit No.: 167-19667-00033 is issued, which is until the year 2015.

(C) The Clean Unit designation for Press #11 and Pess #12 shall expire as follows:

(1) Upon violation of the emission limitation as required in the PSD Permit No.: 167-19667-00033.

(2) Change in the physical or operational characteristic that formed the basis of determination as the potential to emit, production capacity, or throughput.

(3) Replacement of the specific air pollution control technology that was the basis for the clean unit designation.

(D) Emission limit required for Press #11 and Press #12 in conjunction with the PSD BACT shall stay the same upon expiration of the Clean Unit designation.

(E) If an existing Clean Unit designation expires, the owner or operation can requalify for a Clean Unit redesignation under the current applicable requirements in the area.

State Rule Applicability - Individual Facilities

(a) 326 IAC 8-5-5 – (Graphic Arts Operations)
This rule applies to flexographic printing sources constructed after November 1, 1980, located anywhere in the state with potential emissions of twenty-five (25) tons of VOC per year.

Pursuant to 326 IAC 8-5-5(e)(3), flexographic printing operations are required to achieve a minimum of sixty percent (60%) overall control efficiency.

Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks shall have an incineration system of 90% destruction efficiency. Bemis Company, Inc. is in compliance with this rule, as Presses #11 and #12 catalytic oxidizers are designed above 90% destruction efficiency.

(b) 326 IAC 8-1-6 (General Reduction Requirements)
This rule does not apply to presses #11 and #12, as these presses are subject to 326 IAC 8-5-5.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements. Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Changes to the Part 70 Permit

The Part 70 Permit T167-6182-00033, issued on June 28, 2004 will be modified to incorporate the PSD/Significant Source Modification 167-19667-00033 (additions are **bolded** and deletions are ~~struck-through~~ for emphasis)

Existing Condition C.16 in the Part 70 will be replaced by the following condition:

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, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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, and Vigo County Air Pollution Control on or before the date it is due.

Section A.2 will be modified to follow the description in the PSD/Significant Source Modification 167-19667-0003 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:

(1) through (35) no change

(36) ~~Catalytic Oxidizer, identified as I1, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 1.~~

~~(37) Catalytic Oxidizer, identified as I2, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 2.~~

~~(38) Catalytic Oxidizer, identified as I3, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 3.~~

~~(39) Catalytic Oxidizer, identified as I4, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 4.~~

Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.
(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)

~~(40)~~**(37)** Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 5.

~~(41)~~**(38)** Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 6.

~~(42)~~**(39)** Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 7.

~~(43)~~**(40)** Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 8.

~~(44)~~**(41)** Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 9.

~~(45)~~**(42)** Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 10.

~~(46)~~**(43)** Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 11.

~~(47)~~**(44)** Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 12.

~~(48)~~**(45)** Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.

~~(49)~~**(46)** Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.

~~(50)~~**(47)** Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.

~~(51)~~**(48)** Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no

control, and exhausting to stack 113.

~~(52)~~**(49)** Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.

~~(53)~~**(50)** Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.

~~(54)~~**(51)** Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.

~~(55)~~**(52)** Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.

~~(56)~~**(53)** Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.

~~(57)~~**(54)** Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.

~~(58)~~**(55)** Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.

~~(59)~~**(56)** Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.

~~(60)~~**(57)** Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.

~~(61)~~**(58)** Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.

~~(62)~~**(59)** Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.

~~(63)~~**(60)** Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.

~~(64)~~**(61)** Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.

~~(65)~~**(62)** Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.

~~(66)~~**(63)** Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.

~~(67)~~**(64)** Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

Section D.2 will be modified to match the numbering in Section A.2 as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(1) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.

(2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack

202.

(3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.

(4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.

(5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.

(6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.

(7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.

~~(8)~~**(35)** Cyrel plate making facility exhausting to stack 23.

~~(9)~~**(57)** Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.

~~(10)~~**(58)** Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.

~~(11)~~**(59)** Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.

~~(12)~~**(60)** Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.

~~(13)~~**(61)** Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.

~~(14)~~**(62)** Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.

~~(15)~~**(63)** Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.

~~(16)~~**(64)** Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

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

Section D.2 will be modified to match the numbering in Section A.2 as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

~~(1) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.~~

~~(2) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.~~

~~(3)~~ **(10)** Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

~~(4)~~**(11)** Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to

stacks 1, 2, 3, and/or 4.

~~(5)~~**(12)** Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

~~(6)~~**(13)** Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

~~(7)~~**(14)** Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

~~(8)~~**(15)** Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

~~(9)~~**(36)** Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.
(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)

~~Catalytic Oxidizer, identified as I1, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 1.~~

~~(10) Catalytic Oxidizer, identified as I2, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 2.~~

~~(11) Catalytic Oxidizer, identified as I3, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 3.~~

~~(12) Catalytic Oxidizer, identified as I4, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 4.~~

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

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2] ~~[40 CFR 52.21]~~

~~(a) Pursuant to the Construction Permit (which was not numbered), issued on May 27, 1986, and revised through this Part 70 permit, the following conditions apply:~~

~~(1) The annual VOC input to Press #11 and Press #12 combined shall be limited such that the potential to emit does not exceed 66.24 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 66.24 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and~~

~~(2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #11 and Press #12, and~~

~~The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #11 and #12) with regard to 326 IAC 2-2 (PSD).~~

~~(b)~~ **(a)** Pursuant to Construction Permit PC-84-1669, issued on November 25, 1987, and revised through this Part 70 permit, the following conditions apply:

(1) The annual VOC input to Press #13, Press #14, Press #15, and Press #16 combined shall be limited such that the potential to emit does not exceed 94 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 94 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and

(2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #13, Press #14, Press #15, and Press #16.

~~(c)~~ **(b)** Pursuant to Construction Permit PC-84-1842, issued on April 6, 1990, and revised through this Part 70 permit, the following conditions apply:

(1) The annual VOC input to Press #17 and Press #18 shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 39.9 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and

(2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #17 and Press #18.

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #17 and #18) with regard to 326 IAC 2-2 (PSD).

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

(a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the ~~eight (8)~~ **six (6**) printing presses ~~(Press #11, Press #12,~~ Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.

(b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) shall maintain a minimum destruction efficiency of 90%.

D.2.3 no change

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (~~Press #11, Press #12~~, Press #13, Press #14, Press #15, Press #16, Press #17, and Press #18) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.

(b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.5 no change

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

D.2.6 no change

D.2.7 Oxidizer Ganging

Oxidizer Unit 1, Unit 2, Unit 3, and Unit 4, are each designed to handle 7250 acfm of solvent laden air. These oxidizers are considered to be combined with the following restrictions:

(a) Before any of the affected presses (Presses ~~#11~~ **#13** through #18) can operate, one oxidizer shall be warmed up, and operational;

(b) Presses ~~#11~~ **#13** through #18 are each rated at 3500 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.

(c) In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).

(d) In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es). Any press shut down in this fashion can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.

(e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

D.2.8 Monitoring

(a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the ~~eight (8)~~ **six (6)** printing presses (~~Press #11, Press #12~~, Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the four (4) catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.2.9 No change

D.2.10 No change

Section D.3 will be modified to match the numbering in Section A.2 as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

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

~~(1)~~ **(16)** Flexographic printing press, identified as press #19, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(2)~~ **(17)** Flexographic printing press, identified as press #20, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(3)~~ **(18)** Flexographic printing press, identified as press #21, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(4)~~ **(19)** Flexographic printing press, identified as press #22, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(5)~~ **(20)** Flexographic printing press, identified as press #23, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(6)~~ **(21)** Flexographic printing press, identified as press #24, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(7)~~ **(22)** Flexographic printing press, identified as press #25, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(8)~~ **(23)** Flexographic printing press, identified as press #27, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(9)~~ **(24)** Flexographic printing press, identified as press #28, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(10)~~**(25)** Flexographic printing press, identified as press #29, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(11)~~**(26)** Flexographic printing press, identified as press #30, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(12)~~**(27)** Flexographic printing press, identified as Press 31, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(13)~~**(28)** Flexographic printing press, identified as Press 32, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(14)~~**(29)** Flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(15)~~**(30)** Flexographic printing press, identified as Press 34, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(16)~~**(31)** Flexographic printing press, identified as Press 35, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

Continued on the next page

Continued from the previous page

~~(17)~~**(33)** Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

~~(18)~~**(37)** Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 5.

~~(19)~~**(38)** Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 6.

~~(20)~~**(39)** Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 7.

~~(21)~~**(40)** Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 8.

~~(22)~~**(41)** Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 9.

~~(23)~~**(42)** Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 10.

~~(24)~~**(43)** Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 11.

~~(25)~~**(44)** Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 12.

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

Section D.4 will be modified to match the numbering in Section A.2 as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

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

~~(1)~~**(32)** Flexographic in-line portable printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.

~~(2)~~**(45)** Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control,

and exhausting to stack 102.

~~(3)~~**(46)** Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.

~~(4)~~**(47)** Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.

~~(5)~~**(48)** Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.

~~(6)~~**(49)** Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.

~~(7)~~**(50)** Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.

~~(8)~~**(51)** Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.

~~(9)~~**(52)** Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.

~~(10)~~**(53)** Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.

~~(11)~~**(54)** Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.

~~(12)~~**(55)** Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.

~~(13)~~**(56)** Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.

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

The following Section D.5 which reflects the PSD applicable requirements for Press #11 and Press #12 will be added in the Part 70 permit:

FACILITY OPERATION CONDITIONS

SECTION D.5

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

(8) Flexographic printing press, identified as Press #11, using Catalytic Oxidation for control and exhausting to stacks 1, 2, 3, and /or 4;

(9) Flexographic printing press, identified as Press #12, using Catalytic Oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

(36) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr), are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.

(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)

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

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

D.5.1 Prevention of Significant Deterioration – Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the PSD BACT for Bemis Company shall be the following:

(a) Whenever Press #11 or Press #12 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.

(b) The capture efficiency system for Presses #11 and #12 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:

(1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.

(2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.

(3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

(4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.

(5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.

(6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:
Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

Compliance with this condition shall satisfy the requirements of 326 IAC 2-2, Prevention of Significant Deterioration.

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

(a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for flexographic printer identified as Press #11 and Press #12 in conjunction with the catalytic oxidation systems shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.

(b) Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks for flexographic printer identified as Presses #11 and #12 the incineration systems shall maintain a minimum of 90% destruction efficiency.

D.5.3 Clean Units [326 IAC 2-2.2]

(a) Pursuant to 326 IAC 2-2.2, Press #11 and Press #12 are designated as Clean Units for volatile organic compounds (VOC) emissions.

(b) The Clean Unit designation for Press #11 and Press #12 shall be in effect for ten (10) years from the date this PSD Permit No.: 167-19667-00033 is issued.

(c) In order to maintain the Clean Unit designation for Press #11 and Press #12:

(1) the Permittee shall comply with the PSD BACT limit established for these presses and their VOC control systems found in Condition D.5.1.

(2) no physical change or change in the method of operation shall be made for Press #11 and Press #12 that will allow them to be operated in a manner that is inconsistent with their original physical or operational characteristic.

(3) the Permittee shall not replace the specific air pollution control technology with one that has a lower control efficiency than the original control that was established as BACT.

(d) Any project at these presses for which actual construction begins after the effective date and before the expiration date of the clean units designation shall be considered to have occurred while the emissions units were clean units.

(e) If a project at these emission units does not cause the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT and the project would not alter any physical or operational characteristics that formed the basis for the BACT determination, the clean unit designations remain unchanged.

(f) **If a project causes the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT or the project would alter any physical or operational characteristics that formed the basis for the BACT determination, then the clean unit designations shall expire upon issuance of the necessary permit modifications, unless the units requalify as clean units. If the Permittee begins actual construction on the project without first applying to modify the emissions unit's permit, the clean unit designations shall expire immediately prior to the time when actual construction of this project begins.**

(g) **The Emission limits required for Press #11 and Press #12 in conjunction with the PSD BACT shall stay the same upon expiration of the Clean Unit designation.**

(h) **A change that causes emission units to lose their clean unit designation shall be subject to the applicability requirements of 326 IAC 2-2-2(d)(1) through 326 IAC 2-2-2(d)(4) and 326 IAC 2-2-2(d)(6).**

D.5.4 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 these facilities and their control devices.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within sixty days (60) after the issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency and the total enclosure as per Condition D.5.1 for the Catalytic Oxidizers utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.5.6 Thermal Oxidizer Temperature

(a) **A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12. For the purpose of this condition, continuous means no less than once per minute. 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 take appropriate response steps in accordance with Part 70 Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of any catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12 Catalytic Oxidizers is below 550 ^{o}F. A three (3) hour average temperature that is below 550 ^{o}F is not a deviation from this permit. Failure to take response steps in accordance with Part 70 Section C – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.**

(b) **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.5.1, as approved by IDEM.**

(c) **On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

D.5.7 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when Press #11 and Press #12 Catalytic Oxidizers are in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Compliance Monitoring Requirements

D.5.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, Presses #11 and #12 are subject to CAM. Since these presses do not have a PTE after controls at major source significant levels, the CAM plan for these presses shall be submitted as part of the Part 70 permit renewal application.

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

D.5.9 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below.

(1) The continuous temperature records (reduced to a three-hour average basis) for the Press #11 and Press #12 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.5.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

Emission units in Section D.5, now D.6 will be modified to match the numbering in Section A.2 as follows:

SECTION ~~D.5~~ D.6 FACILITY CONDITIONS

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

~~(1)~~**(34)** Closed Solvent Spray type parts washer exhausting to stack 20.

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

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

D~~.5.1~~ **6.1** Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.~~5.2~~ **6.2** Volatile Organic Compounds (VOC) [326 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Section D.6, is now D.7:

SECTION ~~D.6~~ D.7 FACILITY CONDITIONS

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

(1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]

(3) "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM source. [326 IAC 6-1-2]

(4) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

(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.~~6.1~~ **7.1** Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) emissions from these facilities shall not exceed 0.03 grain per dry standard cubic foot.

~~**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**~~
~~**OFFICE OF AIR QUALITY**~~
~~**COMPLIANCE DATA SECTION**~~
~~**and**~~
~~**VIGO COUNTY AIR POLLUTION CONTROL**~~
~~**Part 70 Quarterly Report**~~

~~Source Name: Bemis Company, Inc.~~
~~Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804~~
~~Mailing Address: PO Box 905, Terre Haute, Indiana 47808~~
~~Part 70 Permit No.: T167-6182-00033~~
~~Facility: Press #11 and Press #12~~
~~Parameter: VOC emission~~
~~Limit: Combined emission less than 66.24 tons per 12 consecutive month period with compliance demonstrated at the end of each month.~~

~~YEAR:~~

~~Month~~	~~Press #11~~			~~Press #12~~			~~Press #11 and Press #12 Combined~~
	~~Ton VOC this month~~	~~Ton VOC last 11 months~~	~~Ton VOC 12 month total~~	~~Ton VOC this month~~	~~Ton VOC last 11 months~~	~~Ton VOC 12 month total~~	~~Ton VOC 12 month total~~

~~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.~~

Conclusion

The operation of Presses #11 and #12 shall be subject to the conditions of the attached **PSD Significant Source Modification 167-19667-00033 and Significant Permit Modification 167-19669-00033.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a PSD/Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Bemis Company
Source Location:	1350 North Fruitridge Ave., Terre Haute, Indiana 47805
County:	Vigo
SIC Code:	2673, 3081, and 3079
Operation Permit No.:	T167-6182-00033
Operation Permit Issuance Date:	June 28, 2004
PSD Significant Source Modification No.:	SSM 167-19667-00033
Significant Permit Modification No.:	SPM 167-19669-00033
Permit Reviewer:	Aida De Guzman

On March 18, 2005 the Office of Air Quality (OAQ) had a notice published in the Tribune Star in Terre Haute**,** Indiana, stating that Bemis Company had applied for a PSD/Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit to operate two existing flexographic printing presses #11 and #12. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 15, 2005 Bemis Company made the following comments to the proposed PSD/Significant Source Modification and Significant Permit Modification (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

Comment 1: Testing Requirements

Because capture efficiency is independent of destruction efficiency and with the facility utilizing its existing catalytic oxidation system to achieve BACT, Bemis requests that testing of the control system be separated into its two parts (reference Conditions D.2.4 and D.3.5). Bemis agrees that the capture efficiency systems can be tested within sixty (60) days of issuance of these permit modifications; however, Bemis should be allowed the flexibility to test the VOC destruction efficiency of the connected catalytic oxidization system within the thirty (30) months as allowed in the original Part 70 permit.

Response 1: Testing required under New Source Review is done within sixty (60) days after achieving maximum production rate or since Press #11 and Press #12 already exist and in operation, testing is required within sixty days after the issuance of this Significant Permit Modification 167-19669-00033. Testing at this schedule is necessary to demonstrate compliance with the PSD BACT requirements. Flexibility or deferral of the testing can be allowed if testing has been performed on these presses' catalytic oxidizers in the past few years. IDEM's record, which was confirmed by Bemis stack testing record received by IDEM on April 21, 2005, shows no testing has been done for these presses catalytic oxidizers since 1997. Therefore, capture efficiency and destruction efficiency testing schedule will stay the same.

Comment 2: D.5.7 Parametric Monitoring

The Permittee (Bemis) should be allowed more monitoring options than just duct pressure or fan amperage. Referencing USEPA's recently issued Technical Support Document (TSD) For Title V Permitting of Printing Facilities monitoring differential pressure across the wall of the permanent total enclosure should also be acceptable. Also, because capture efficiency is independent of destruction efficiency, the monitoring parameter should be tied to a "compliance demonstration test", not a "stack test". A stack test is typically associated with destruction efficiency testing and has no bearing on the evaluation of permanent total enclosures. Correspondingly, we would suggest rewording Condition D.5.7 as follows:

(a) The Permittee shall determine the appropriate permanent total enclosure monitoring parameter and value (duct pressure, fan amperage, pressure differential, etc.) during the most recent permanent total enclosure evaluation demonstrating compliance with the limits in Condition D.5.1, as approved by IDEM.

(b) The established permanent total enclosure monitoring parameter shall be observed at least once per day whenever the press is in operation. On and after the date the approved compliance demonstration results are available, the permanent total enclosure monitoring parameter shall be maintained either within the normal range or above some minimum value as established during the most recent compliance demonstration test.

Response 2: Based on the "USEPA's Technical Guidance for Title V Permitting of Printing Facilities" differential pressure across the wall of the permanent total enclosure is an acceptable parameter to monitor. The term "performance test" found in page 63 Section 5.5.2 of the USEPA Technical Guidance for Title V Permitting of Printing Facilities will be used in Condition D.5.7, instead of the term "stack test". Therefore, Condition D.5.7 will be revised as follows:

D.5.7 Parametric Monitoring

(a) The Permittee shall determine the appropriate ~~duct pressure or fan amperage~~ **permanent total enclosure monitoring parameter and value (**duct pressure, or fan amperage or **differential pressure)** from the most recent ~~valid stack test~~ performance **test** that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM.

(b) The **established permanent total enclosure monitoring parameter and value** (duct pressure, or fan amperage or **differential pressure)** shall be observed at least once per day when Press #11 and Press #12 Catalytic Oxidizers are in operation. On and after the date the approved **compliance demonstration** ~~stack test~~ results are available, **the permanent total enclosure monitoring parameter** ~~the duct pressure or fan amperage~~ shall be maintained within the normal range as established in most recent ~~compliant stack~~ **performance** test.

Comment 3: D.5.9 Record Keeping Requirements

Corresponding to the above comments on Condition D.5.7, Parametric Monitoring, Condition D.5.8(a)(2) should be reworded as follows:

(2) Daily records of the duct pressure, or fan amperage, differential pressure or other IDEM approved permanent total enclosure monitoring parameter.

Response 3: Condition D.5.9 will be revised to incorporate the changes in Condition D.5.7 as follows:

D.5.9 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below.

(1) The continuous temperature records (reduced to a three-hour average basis) for the Press #11 and Press #12 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Daily record of the duct pressure, or fan amperage **or differential pressure.**

(b) To document compliance with Condition D.5.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.