



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

November 22, 2004

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

TO: Interested Parties / Applicant  
RE: Color-Box, LLC / 177-19793-00063  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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November 22, 2004

Mr. Jeff Pobanz  
Color-Box, LLC  
623 South G Street  
Richmond, Indiana 47374

Re: 177-19793-00063  
Notice-only change to  
MSOP 177-19637-00063

Dear Mr. Pobanz:

Color-Box, LLC was issued a renewed Minor Source Operating Permit August 20, 2004 for a stationary lithographic printing source located at 1056 Industries Road, Richmond, Indiana 47374. A letter notifying the Office of Air Quality of an exempt change and a notice-only change to the permit was received on November 1, 2004. The source plans to add an exempt in-line gluer, identified as G-1, with potential glue usage of fifty-five (55) tons per year and potential emissions of regulated criteria pollutants and hazardous air pollutants of less than the exemption threshold levels specified in 326 IAC 2-1.1-3. The source also plans to add an additional diecutter, identified as DC-2, of the same type and capacity as the permitted diecutter DC-1. Diecutter DC-2 will comply with the same applicable requirements and permit terms and conditions as DC-1, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The addition of diecutter DC-2 is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13).

Pursuant to the provisions of 326 IAC 2-6.1-6, Section A.2, Sections D.2 through D.4 of the permit are hereby revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

## A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (c) One (1) pneumatic scrap paper conveyance system using one (1) air separator/air screen, identified as S-3, installed in 2001, processing up to 5,000 pounds scrap paper per hour, using a cartridge filter for particulate control, exhausting at one (1) stack identified as EP #4, and connected to the following equipment:
  - (1) One (1) corrugator, identified as C-1;
  - (2) One (1) laminator, identified as L-1;
  - (3) One (1) shredder, identified as SH-1; and
  - (4) ~~One~~ **Two (42)** die cutters, identified as DC-1 **and DC-2**.
- (h) **One (1) in-line gluer, identified as G-1, with potential glue usage of fifty-five (55) tons per year.**

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Emission Unit Description:**

- (c) One (1) pneumatic scrap paper conveyance system using one (1) air separator/air screen, identified as S-3, installed in 2001, processing up to 5,000 pounds scrap paper per hour, using a cartridge filter for particulate control, exhausting at one (1) stack identified as EP #4, and connected to the following equipment:
- (1) One (1) corrugator, identified as C-1;
  - (2) One (1) laminator, identified as L-1;
  - (3) One (1) shredder, identified as SH-1; and
  - (4) ~~One~~ **Two (2)** die cutters, identified as DC-1 **and DC-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**

**D.2.1 Particulate [326 IAC 6-3-2]**

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from air separator/air screen S-3, connected to the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 **and DC-2**), shall not exceed 7.57 pounds per hour when operating at a process weight rate of 2.5 tons per hour.

**Compliance Determination Requirements**

**D.2.4 Particulate Control**

Pursuant to Minor Permit Revision No. 177-14208, issued on May 10, 2001, and in order to comply with condition D.2.1, the Permittee shall comply as follows:

- (c) The air separator/air screen with cartridge filter (S-3) for particulate control shall be in operation and control emission from the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1 **and DC-2**) at all times that these facilities are in operation.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.2.5 Visible Emissions Notations**

- (a) Visible emission notations of the starch silo (S-1), starch kitchen (S-2), and corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 **and DC-2**) stack exhausts (i.e., stack vents EP-1, EP2 and EP4, respectively) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

**D.2.6 Parametric Monitoring**

- (c) The Permittee shall record the total static pressure drop across the air separator/air screen filter (S-3) used in conjunction with the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1 **and DC-2**), at least once per shift when the corrugator (C-1),

laminator (L-1), shredder (SH-1) and the die cutters (DC-1 **and** DC-2) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the filter is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

**D.2.7 Baghouse and Filter Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the starch silo (S-1), and the filters controlling the starch kitchen (S-2) and the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 **and** DC-2) connected to the air separator/air screen (S-3), when venting to the atmosphere. A baghouse and filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags and filters shall be replaced.

**Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the starch silo (S-1), starch kitchen (S-2), and corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 **and** DC-2) stack exhausts (i.e., stack vents EP-1, EP2 and EP4, respectively) once per shift when venting to the atmosphere.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

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, please contact Nathan C. Bell, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-234-3350 or in Indiana at 1-800-451-6027 (ext 43350).

Sincerely,

Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

ncb

Attachments

cc: File - Wayne County  
U.S. EPA, Region V  
Wayne County Health Department  
Air Compliance Section Inspector - DJ Knotts  
Compliance Data Section - Jennifer Dorn  
Administrative and Development  
Technical Support and Modeling - Michelle Boner



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## MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

### Color-Box, LLC - Richmond Division 1056 Industries Road Richmond, Indiana 47374

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 177-18637-00063	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 20, 2004  Expiration Date: August 20, 2009
First Notice Only Change: 177-19793-00063	Pages Affected: 5, 16, 17, 18, 19
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 22, 2004

- (4) Two (2) die cutters, identified as DC-1 and DC-2.
- (d) One (1) scrap paper baler, identified as BA-1.
- (e) One (1) natural gas fired steam generator, identified as B-1, installed in 2001, with a maximum heat input capacity of 6.2 million (MM) British thermal units (Btu) per hour, and exhausting to one stack identified as EP #3.
- (f) One (1) above ground storage tank with a capacity of 5,000 gallons, installed in 2001, storing laminating glue.
- (g) One (1) above ground storage tank with a capacity of 6,000 gallons, installed in 2004, storing aqueous coating.
- (h) One (1) in-line gluer, identified as G-1, with potential glue usage of fifty-five (55) tons per year.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) pneumatic starch conveyance system, installed in 2001, processing up to 3,500 pounds starch per hour, and connected to the following equipment:
- (1) One (1) starch silo, identified as S-1, with a storage capacity of 65 tons of starch, using a baghouse for particulate matter control, exhausting to one (1) stack, identified as EP #1; and
  - (2) One (1) starch kitchen (mixer), identified as S-2, using a filter sock for particulate matter control, and exhausting to one (1) stack, identified as EP #2.
- (c) One (1) pneumatic scrap paper conveyance system using one (1) air separator/air screen, identified as S-3, installed in 2001, processing up to 5,000 pounds scrap paper per hour, using a cartridge filter for particulate control, exhausting at one (1) stack identified as EP #4, and connected to the following equipment:
- (1) One (1) corrugator, identified as C-1;
  - (2) One (1) laminator, identified as L-1;
  - (3) One (1) shredder, identified as SH-1; and
  - (4) Two (2) die cutters, identified as DC-1 and DC-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

#### D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the starch silo S-1 shall not exceed 5.96 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the starch kitchen S-2 shall not exceed 5.96 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from air separator/air screen S-3, connected to the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 and DC-2), shall not exceed 7.57 pounds per hour when operating at a process weight rate of 2.5 tons per hour.

The above pounds per hour limitations were each calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

**D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

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Any change or modification which would increase the potential to emit VOC from the corrugator (C-1)/laminator (L-1) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

**D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pneumatic starch and scrap paper conveyance systems and their control devices.

**Compliance Determination Requirements**

**D.2.4 Particulate Control**

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Pursuant to Minor Permit Revision No. 177-14208, issued on May 10, 2001, and in order to comply with condition D.2.1, the Permittee shall comply as follows:

- (a) The baghouse for particulate control shall be in operation and control emissions from the starch silo (S-1) at all times that the starch silo is in operation.
- (b) The filter sock for particulate control shall be in operation and control emissions from the starch kitchen (S-2) at all times that the starch kitchen is in operation.
- (c) The air separator/air screen with cartridge filter (S-3) for particulate control shall be in operation and control emission from the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1 and DC-2) at all times that these facilities are in operation.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.2.5 Visible Emissions Notations**

---

- (a) Visible emission notations of the starch silo (S-1), starch kitchen (S-2), and corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 and DC-2) stack exhausts (i.e., stack vents EP-1, EP2 and EP4, respectively) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

#### D.2.6 Parametric Monitoring

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- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the starch silo (S-1), at least once per shift when the starch silo (S-1) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
  
- (b) The Permittee shall record the total static pressure drop across the filter sock used in conjunction with the starch kitchen (S-2), at least once per shift when the starch kitchen (S-2) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the filter sock is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
  
- (c) The Permittee shall record the total static pressure drop across the air separator/air screen filter (S-3) used in conjunction with the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1 and DC-2), at least once per shift when the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1 and DC-2) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the filter is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure in paragraphs (a), (b) and (c) shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.2.7 Baghouse and Filter Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the starch silo (S-1), and the filters controlling the starch kitchen (S-2) and the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 and DC-2) connected to the air separator/air screen (S-3), when venting to the atmosphere. A baghouse and filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags and filters shall be replaced.

#### D.2.8 Broken or Failed Bag and Filter Detection

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In the event that bag or filter failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag or filter failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses and filters, if failure is indicated by a significant drop in the baghouse's or filter's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag or filter failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

#### **Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

##### D.2.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the starch silo (S-1), starch kitchen (S-2), and corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1 and DC-2) stack exhausts (i.e., stack vents EP-1, EP2 and EP4, respectively) once per shift when venting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.