



*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: January 11, 2005  
RE: Product Specialities, Inc. / 043-20492-00039  
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 1/10/05



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Mitchell E. Daniels, Jr.  
Governor

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Commissioner

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January 11, 2005

Mr. Bob Scott  
Product Specialties, Inc.  
2073 McDonald Avenue  
New Albany, Indiana 47150

Re: 043-20492-00039  
Second Administrative Amendment to  
FESOP 043-15615-00039

Dear Mr. Scott:

Product Specialties, Inc., located at 2073 McDonald Avenue, New Albany, Indiana 47150, was issued a FESOP on January 22, 2003 for operation of a stationary plastic film manufacturing plant. A letter requesting a change to the FESOP was received on December 14, 2004. The source requested that permit be updated to remove equipment that has not been installed (EU-14, EU-10, and Washer Coater #2) and to correctly identify the facilities and the associated control devices listed under A.2 and D.1 of the permit (EU-13 exhausts to stacks S12 and S13; and EU-08 is being moved then renamed to EU-14 and will exhaust to S-14). All emission units and control devices described below are considered previously permitted under FESOP 043-15615-00039, and these changes do not result in an increase in the potential to emit of any regulated pollutant. Each of these changes qualify as a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term", under 326 IAC 2-8-10, Administrative Amendment.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows deleted language as ~~strikeouts~~ and new language **bolded**:

## A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (c) ~~Two~~**One (21)** plastic film mixing lines, identified as EU-05 ~~and EU-10~~, with a maximum capacity of 1588 pounds per hour, using ~~a~~ baghouses for particulate matter control, exhausting to stack vent V3;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of sheet vinyl, exhausting to stacks ~~S-14~~ **S12 and S13**;
- ~~(h) One (1) printing press, identified as wash coater #2, with a maximum line speed of 150 feet per minute (ft/min) and a coating width of 57 inches, exhausting to stack WC2;~~
- (ih) ~~Three~~**Two (32)** laminators, identified as EU-~~1408~~, ~~and~~ EU-12, ~~and~~ EU-14, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks ~~S146~~, ~~and~~ S8, ~~and~~ S15.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]: Plastic Film Manufacturing Operation**

- (c) ~~Two~~**One (21)** plastic film mixing lines, identified as EU-05 ~~and EU-10~~, with a maximum capacity of 1588 pounds per hour, using ~~a~~ baghouses for particulate matter control, exhausting to stack vent V3;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of sheet vinyl, exhausting to stacks ~~S14~~ **S12 and S13**;
- (h) ~~One (1) printing press, identified as wash coater #2, with a maximum line speed of 150 feet per minute (ft/min) and a coating width of 57 inches, exhausting to stack WC2;~~
- (ih) ~~Three~~**Two (32)** laminators, identified as EU-~~1408~~, **and EU-12, and EU-14**, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks ~~S146, and S8, and S15.~~

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

**Emissions Limitations and Standards [326 IAC 2-8-4(1)]**

**D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]**

Pursuant to 40 CFR 52 Subpart P (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the storage silos (EU-1 & EU-2), the mixing operations (EU-5 ~~& EU-10~~), the extrusion units (EU-6 & EU-07), and the laminating lines (EU-**148, and EU-12, and EU-14**) shall not exceed the following allowable PM emissions when operating at a process weight rate as shown in the table below:

Process Facility	Stack ID	Process Throughput (tons/hr)	Allowable PM Emissions (lbs/hr)
<del>Plastic Film Mixing Line, EU-10</del>	<del>V6</del>	<del>0.794</del>	<del>3.52</del>
Laminator, EU- <del>1408</del>	<del>S146</del>	0.675	3.15
Laminator, EU-14	<del>S15</del>	<del>0.563</del>	<del>2.79</del>

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]**

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating VOC Limitations), the VOC content of the coatings used from the rotogravure presses EU-09, EU-11, **and EU-13, and wash coater #2** to completely saturate the substrate shall be limited to 4.8 pounds of VOC per gallon of coating less water delivered to the applicator.

D.1.3 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 8-1-6] [326 IAC 20][40 CFR 63, Subpart KK]

Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

- ~~(c) The VOC input from the wash coater #2 shall not exceed 3.11 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 3.11 tons per year.~~
- (dc) The VOC input for the rotogravure press EU-09 shall not exceed 1.55 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 1.55 tons per year.
- (ed) The VOC input for the rotogravure press EU-13 shall not exceed 4.66 tons per twelve (12) month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 4.66 tons per year.
- (fe) The production rate of laminators EU-1408, and EU-12, and EU-14 shall each not exceed 4,670,000 yards of film per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0065 pounds of VOC per yard of film. These limits are equivalent to VOC emissions of 15.17 tons per year of VOC total for each of the ~~three~~two laminators for a total of 45.51.
- (gf) The input of a single HAP to the printers (EU-09, EU-11, and EU-13) and the Wash Coater #2 shall not exceed 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of a combination of HAPs to the printers (EU-09, EU-11, and EU-13) and the Wash Coater #2 shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.9 Particulate Matter (PM)

In order to comply with D.1.1, the baghouses for PM control shall be in operation and control emissions from the silos (EU-1, and EU-2) and the plastic film mixing lines (EU-5 and EU-10) at all times that the plastic film manufacturing is in operation.

D.1.10 Visible Emissions Notations

- (a) Visible emission notations of ~~each~~the plastic film mixing line (EU-5 and EU-10) baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere.

D.1.11 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the plastic film lines (EU-5 and EU-10) when venting to the atmosphere.

D.1.12 Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse associated with the plastic film mixing lines (EU-5 and EU-10), at least once per working shift when each plastic film line is in operation.

#### D.1.14 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visible emission notations of each plastic film lines (EU-5 and EU-10) stack exhaust once per shift and the visible emission notations performed during loading operations of the silos (EU-1 and EU-2).
- (b) To document compliance with Condition D.1.12, the Permittee shall maintain per shift records of the total static pressure drop during normal operation for the plastic film mixing lines (EU-5 and EU-10).

#### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Laminators EU-148, and EU-12, and EU-14  
Parameter: Production Limits  
Limit: 4,630,000 yards of film/per twelve consecutive month period with compliance determined at the end of each month for each laminator (EU-148, and EU-12, and EU-14)

#### FESOP Quarterly Report

Source Name: ~~Product Specialties, Inc.~~  
Source Address: ~~2073 McDonald Avenue, New Albany, Indiana 47150~~  
Mailing Address: ~~2073 McDonald Avenue, New Albany, Indiana 47150~~  
FESOP No.: ~~043-15615-00039~~  
Facility: ~~Washcoater #2~~  
Parameter: ~~VOC Input~~  
Limit: ~~3.11 tons VOC per twelve consecutive month period with compliance determined at the end of each month.~~

#### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-9, EU-11, and EU-13, and Washcoater #2  
Parameter: Single HAP Input  
Limit: 9 tons of input of a single HAP per twelve consecutive month period with compliance determined at the end of each month.

### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-9, EU-11, **and** EU-13, ~~and Washcoater #2~~  
Parameter: Combination of HAPs  
Limit: 24 tons of input of a combination of HAPs per twelve consecutive month period with compliance determined at the end of each month.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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 Bell, at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,

Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
NCB

cc: File - Floyd County  
U.S. EPA, Region V  
Floyd County Health Department  
Air Compliance Section Inspector - Ray Schick  
Compliance Data Section  
Permit Tracking  
Administrative and Development  
Technical Support and Modeling



Mitchell E. Daniels, Jr.  
 Governor

Thomas W. Easterly  
 Commissioner

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**FEDERALLY ENFORCEABLE STATE  
 OPERATING PERMIT (FESOP) RENEWAL  
 OFFICE OF AIR QUALITY**

**Product Specialties, Inc.  
 2073 McDonald Avenue  
 New Albany, Indiana 47150**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F043-15615-00039	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 22, 2003 Expiration Date: January 22, 2008
First Administrative Amendment No: 043-19075-00039	Issuance Date: July 21, 2004

Second Administrative Amendment No: 043-20492-00039	Pages Affected: 6, 7, 26, 27, 28, 29, 30, 39, 44, 45, 46
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 11, 2005

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a plastic film manufacturing plant.

Authorized individual:	Vice President
Source Address:	2073 McDonald Avenue, New Albany, Indiana 47150
Mailing Address:	2073 McDonald Avenue, New Albany, Indiana 47150
General Source Phone:	(812) 945-0920
SIC Code:	3081
Source Location Status:	Floyd
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) PVC resin powder storage silo, identified as EU-01, with a maximum storage capacity of 78.8 tons, using a baghouse for particulate matter control, and exhausting to stack vent V1;
- (b) One (1) calcium carbonate (CaCO<sub>3</sub>) storage silo, identified as EU-02, with a maximum storage capacity of 61 tons, using a baghouse for particulate matter control, and exhausting to stack vent V2;
- (c) One (1) plastic film mixing line, identified as EU-05, with a maximum capacity of 1588 pounds per hour, using a baghouse for particulate matter control, exhausting to stack vent V3;
- (d) Two (2) extrusion units, identified as EU-06 and EU-07, each having a limited throughput of 1020 pounds per hour, exhausting to stacks S4 and S5;
- (e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S7;
- (f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S10;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of sheet vinyl, exhausting to stacks S12 and S13;

- (h) Two (2) laminators, identified as EU-14 and EU-12, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks S14 and S8.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas fired combustion sources with the heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired boiler rated at 2.7 MMBTU per hour;
  - (2) One (1) natural gas-fired boiler rated at 2.0 MMBtu/hr,
  - (3) Two (2) natural gas-fired indirect heaters rated at 0.75 MMBtu/hr each,
  - (4) Two (2) natural gas fired dryers rated at 304,000 BTU/hr each,
  - (5) One (1) natural gas fired space heater rated at 580,000 BTU/hr; and
  - (6) One (1) natural gas fired indirect heater for EU-13 rated at 2.0 MMBtu/hr.
- (b) One (1) cold cleaner degreasing operation with a capacity of 20 gallons to clean small parts;
- (c) VOC/HAP storage containers for lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Equipment relating to manufacturing activities that does not result in HAP emissions including brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (e) Closed loop heating and cooling systems;
- (f) Natural draft cooling towers not regulated under a NESHAP;
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blow down for sight glass, boiler, compressors, pumps, and cooling towers.
- (j) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
  - (1) Three (3) granulators that chop waste film and recirculate to the mixing line; and
  - (2) One (1) plastisol mixing line.

A.4 FESOP Applicability [326 IAC 2-8-2]

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Plastic Film Manufacturing Operation

- (a) One (1) PVC resin powder storage silo, identified as EU-01, with a maximum storage capacity of 78.8 tons, using a baghouse for particulate matter control, and exhausting to stack vent V1;
- (b) One (1) calcium carbonate ( $\text{CaCO}_3$ ) storage silo, identified as EU-02, with a maximum storage capacity of 61 tons, using a baghouse for particulate matter control, and exhausting to stack vent V2;
- (c) One (1) plastic film mixing line, identified as EU-05, with a maximum capacity of 1588 pounds per hour, using a baghouse for particulate matter control, exhausting to stack vent V3;
- (d) Two (2) extrusion units, identified as EU-06 and EU-07, each having a limited throughput of 1020 pounds per hour, exhausting to stacks S4 and S5;
- (e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches ( $\text{lb/million in}^2$ ) of PVC sheet, exhausting to stack S7;
- (f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 pounds of ink per million square inches ( $\text{lb/million in}^2$ ) of PVC sheet, exhausting to stack S10;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches ( $\text{lb/million in}^2$ ) of sheet vinyl, exhausting to stacks S12 and S13;
- (h) Two (2) laminators, identified as EU-14 and EU-12, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks S14 and S8.

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

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the storage silos (EU-1 & EU-2), the mixing operations (EU-5), the extrusion units (EU-6 & EU-07), and the laminating lines (EU-14 and EU-12) shall not exceed the following allowable PM emissions when operating at a process weight rate as shown in the table below:

Process Facility	Stack ID	Process Throughput (tons/hr)	Allowable PM Emissions (lbs/hr)
Resin Powder Storage Silo (EU-1)	V1	0.44	2.37
CaCO <sub>3</sub> Storage Silo (EU-2)	V2	0.29	1.79
Plastic Film Mixing Line, EU-05	V3	0.794	3.52
Extrusion Unit, EU-06	S4	0.51	1.66
Extrusion Unit, EU-07	S5	0.51	1.66
Laminator, EU-14	S14	0.675	3.15
Laminator, EU-12	S8	0.844	3.66

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating VOC Limitations), the VOC content of the coatings used from the rotogravure presses EU-09, EU-11, and EU-13 to completely saturate the substrate shall be limited to 4.8 pounds of VOC per gallon of coating less water delivered to the applicator.

D.1.3 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 8-1-6] [326 IAC 20][40 CFR 63, Subpart KK]

Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

- (a) The total material compounded from extruders EU-06 and EU-07 shall not exceed 9,127,920 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0043 lb VOC/lb compounded. These limits are equivalent to a total VOC emissions of 19.6 tons.
- (b) The VOC input for the rotogravure press EU-11 shall not exceed 6.2 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 6.2 tons per year.
- (c) The VOC input for the rotogravure press EU-09 shall not exceed 1.55 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 1.55 tons per year.

- (d) The VOC input for the rotogravure press EU-13 shall not exceed 4.66 tons per twelve (12) month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 4.66 tons per year.
- (e) The production rate of laminators EU-14 and EU-12 shall each not exceed 4,670,000 yards of film per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0065 pounds of VOC per yard of film. These limits are equivalent to VOC emissions of 15.17 tons per year of VOC total for each of the two laminators for a total of 45.51.
- (f) The input of a single HAP to the printers (EU-09, EU-11, and EU-13) shall not exceed 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of a combination of HAPs to the printers (EU-09, EU-11, and EU-13) shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The limits in conditions D.1.4 (a) through (f) are equivalent to less than 80.8 tons per year of VOC. These limits ensure that the VOC emissions for the entire source are less than one hundred (100) tons per year. The HAP input limits are equivalent to emissions of single HAPs of less than 10 tons per year and 25 tons per year of a combination of HAPS from the entire source. Therefore, the requirements of 326 IAC 2-7 are not applicable. The limit in D.1.3 (f) ensures that 326 IAC 8-1-6 does not apply to the laminators. The limit in D.1.3 (g) also ensures that 326 IAC 20 and 40 CFR Subpart KK do not apply.

**D.1.4 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

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The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to printing operations EU-09, EU-11, and EU-13 except when otherwise specified in 40 CFR Part 60, Subpart FFF.

**D.1.5 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60, Subpart FFF]**

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Pursuant to 40 CFR 60.582(a)(1), the permittee shall use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids in the printing operations EU-09, EU-11, and EU-13.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.7 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60, Subpart FFF]**

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Compliance with the VOC content contained in Condition D.1.5 shall be determined pursuant to 40 CFR 60.583(c) using plant blending and inventory records for each affected facility in conjunction with ink manufacturers' formulation data.

**D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)**

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Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.9 Particulate Matter (PM)**

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In order to comply with D.1.1, the baghouses for PM control shall be in operation and control emissions from the silos (EU-1, and EU-2) and the plastic film mixing line (EU-5) at all times that the plastic film manufacturing is in operation.

## **Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]**

### **D.1.10 Visible Emissions Notations**

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- (a) Visible emission notations of the plastic film mixing line (EU-5) baghouse stack exhaust 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) Visible emission notations from each storage silo baghouse stack exhaust (EU-1 and EU-2) shall be performed during loading operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) The Compliance Response Plan for this unit 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, Implementation, Records, and Reports, shall be considered a violation of this permit.

### **D.1.11 Baghouse Inspections**

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An inspection shall be performed within the last month of each calendar quarter of all bags controlling the plastic film line (EU-5) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

### **D.1.12 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across each baghouse associated with the plastic film mixing line (EU-5), at least once per working shift when each plastic film line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 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, Implementation, Records, and Reports. 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, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

#### D.1.13 Broken or Failed Bag Detection

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In the event that bag 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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

##### D.1.14 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visible emission notations of each plastic film line (EU-5) stack exhaust once per shift and the visible emission notations performed during loading operations of the silos (EU-1 and EU-2).
- (b) To document compliance with Condition D.1.12, the Permittee shall maintain per shift records of the total static pressure drop during normal operation for the plastic film mixing line (EU-5).
- (c) To document compliance with VOC and HAPs content and usage limits in Conditions D.1.2, D.1.3, and D.1.5 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.1.2, D.1.3, and D.1.5.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The weighted average VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC and HAP usage for each month; and

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

### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
 Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 FESOP No.: 043-15615-00039  
 Facility: Laminators EU-14 and EU-12  
 Parameter: Production Limits  
 Limit: 4,630,000 yards of film/per twelve consecutive month period with compliance determined at the end of each month for each laminator (EU-14 and EU-12)

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	EU-14	EU-12	EU-14	EU-12	EU-14	EU-12
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-9, EU-11, and EU-13  
Parameter: Single HAP Input  
Limit: 9 tons of input of a single HAP per twelve consecutive month period with compliance determined at the end of each month.

YEAR:

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

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-9, EU-11, and EU-13  
Parameter: Combination of HAPs  
Limit: 24 tons of input of a combination of HAPs per twelve consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.