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: September 21, 2005

RE: Sonoco Flexible Packaging / 081-21218-00005

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

# Notice of Decision: Approval – Effective Immediately

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

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



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Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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

Enclosures
FNTV-PMOD.doc 1/10/05

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Mr. Jeff Cheak
Sonoco Flexible Packaging
6502 South U.S. Highway 31
Edinburgh, Indiana 46124

September 21, 2005

Re: 081-00005
First Minor Permit Modification to
Part 70 Permit No. T081-7183-00005

Dear Mr. Cheak:

Sonoco Flexible Packaging was issued the Part 70 operating permit T081-7183-00005 on July 1, 2003, for their existing source located 6502 South U.S. Highway 31, Edinburgh, Indiana 46124. An application to modify the source was received on May 19, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this existing permit is hereby approved as described in the attached Technical Support Document.

The modification consists of a revision to the conditions of one (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU101. The revisions concern the control efficiency for EU101 and the limitation on the quantity of VOC used in the process.

Pursuant to 326 IAC 2-7-10.5 the project is below the minor source modification threshold.

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 Lawrence Stapf, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027 and ask for Lawrence Stapf extension 2-8427, or directly dial (317) 232-8427.

Sincerely,
Original signed by

Paul Dubenetzky, Assistant Commissioner
Office of Air Quality

Attachments
LS
cc: File – Johnson County
U.S. EPA, Region V
Johnson County Health Department
Air Compliance Section Inspector: Vaughn Ison
Compliance Data Section
Administrative and Development

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# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

## Sonoco Flexible Packaging
## 6502 S. U.S. Highway 31
## Edinburgh, Indiana 46124

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T081-7183-00005 | |
|---|---|
| Issued by:Original signed by Janet McCabe<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Quality | Issuance Date: July 1, 2003<br><br>Expiration Date: July 1, 2008 |

First Administrative Amendment 081-17977-00005, issued August 22, 2003
First Significant Permit Modification 081-17782-00005, issued July 14, 2005

| First Minor Permit Modification 081-21218-00005 | Pages Affected: 3-4, 8-10, 12-16, 19-21, 24-26, 29-33, 44 and 46 |
|---|---|
| Issued by: Original signed by<br><br>Paul Dubenetzky, Assistant Commissioner<br>Office of Air Quality | Issuance Date: September 21, 2005 |

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## SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

| | |
|---|---|
| Responsible Official: | Jeff Cheak |
| Source Address: | 6502 S. U.S. Highway 31, Edinburgh, IN 46124 |
| Mailing Address: | P.O. Box 188, U.S. 31 North, Edinburgh, IN 46124-0188 |
| General Source Phone Number: | (812) 526-5511, ext. 224 |
| SIC Code: | 2671, 2754, 2759 |
| County Location: | Johnson |
| Source Location Status: | Non-attainment for PM2.5 and 8-hr ozone<br>Attainment for all remaining criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source, under PSD, Emission Offset Rules and Non-attainment NSR<br>Major Source, Section 112 of the Clean Air Act |

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

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

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(h) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold cleaner degreasing units, EU 102 and EU 105, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether. EU 102 is limited to 12 cycles per day and 350 days per year.) [326 IAC 8-3].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(d) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(a) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

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

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any emission limitation, standard, or rule contained in this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the emission limitation, standard, or rule if the appropriate performance or compliance test or procedure had been performed.

**SECTION C** **SOURCE OPERATION CONDITIONS**

**Entire Source**

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

C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( ±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( ±2%) of full scale reading.

(c) The Permittee may request IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(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 purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) or 326 IAC 2-3-1 (z)) may result in a significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;
  - (ii) Projected actual emissions;
  - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) or 326 IAC 2-3-1(mm)(2)(A)(3)); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

(f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

(g) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

**Stratospheric Ozone Protection**

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

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

**Part 2 MACT Application Submittal Requirement**

C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(3) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(4) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(5) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard, if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

## SECTION D.1 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

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

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

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 11, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.5 pounds per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 12, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.41 pounds per MMBtu heat input.

The above limitations are based on the following equation: $Pt = \frac{1.09}{Q^{0.26}}$

Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)
Q = Total source maximum operating capacity rating in MMBtu/hr heat input

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

D.1.2 Record Keeping Requirements, New Source Performance Standards [326 IAC 12] [40 CFR 60.40c]

Pursuant to 40 CFR 60.40c (Subpart Dc), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day, for each boiler, EU 11 and EU 12, as described under 40 CFR 60.48c. The Permittee shall maintain these records for a period of two (2) years.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13.

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

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

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall be less than 798.34 tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of 78.9%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

(c) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(1) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to 1510 tons per consecutive 12-month period, with compliance determined at the end of each month.

(2) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal oxidizer.

(3) All access doors and windows of the 8RL enclosure whose areas were not included in the area of all natural draft openings in the original total enclosure calculation shall be closed during routine operation of the process.

(4) The 8RL thermal oxidizer shall operate at all times the 8RL rotogravure printing press (EU 103) is operated. When operating, the 8RL thermal oxidizer shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain at least ninety-eight percent (98%) destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

These conditions, combined with the PTE of the 8RL degreaser (EU 105), are necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable.

D.2.2 Volatile Organic Compound Emission Limitations for Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5,

(a) the destruction efficiency of the 6RL thermal oxidizer shall be a minimum of ninety percent (90%).

(b) the destruction efficiency of the 8RL thermal oxidizer shall be a minimum of ninety percent (90%).

(c) facility 8RL shall maintain an overall control efficiency of sixty-five percent (65%).

D.2.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). A copy of this rule is attached.

(a) Organic HAP emissions from the rotogravure printing presses, 6RL (EU 101) and 8RL (EU 103), shall be limited to no more than four percent (4%) of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for each month.

(b) Pursuant to 40 CFR 63.825(b)(4), (f)(5), and (f)(7), the Permittee shall demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^{p} M_i C_{ki} + \sum_{j=1}^{q} M_j C_{kj}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b). The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

D.2.5 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 each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), and each corresponding control device.

**Compliance Determination Requirements**

D.2.6 Thermal Oxidizer Compliance [326 IAC 8-1-2(a)]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 6RL thermal oxidizer to achieve compliance with Conditions D.2.1(b), and D.2.2(a).

(b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.2.1(c), D.2.2(b), and D.2.2(c).

D.2.7 Volatile Organic Compounds (VOC) Testing Requirements [326 IAC 8-1-4(a)(3)]

Pursuant to 326 IAC 8-1-4(a)(3), the Permittee shall use Method 24 to determine compliance with the VOC content and usage limitations described under Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) The Permittee shall conduct a performance test between January 1, 2006 and July 30, 2006 to verify compliance with the VOC control efficiency as per Conditions D.2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.2.1(c), D.2.2(b), and D.2.2(c) for the 8RL rotogravure printing press (EU 103) and the 8RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.9 Testing Requirements [40 CFR 63, Subpart KK] [326 IAC 20-18-1]

The organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied shall be determined pursuant to 40 CFR 63.827(b)(2).

D.2.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of the system shall be recorded as a three (3) hour average. From the date of issuance of this permit until approved stack test results from testing conducted pursuant to Condition D.2.8(a) are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature of 1,400°F.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test conducted pursuant to Condition D.2.8(a) that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date of the most recently approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test and shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 6RL 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 violation of this permit.

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

D.2.11 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 Conditions D.2.1(b), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 6RL thermal oxidizer is 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 the most recent compliant stack test.

D.2.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal Oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F 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.

(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.2.1(c), 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 three (3) hour average temperature of the 8RL 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 violation of this permit.

D.2.13 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(c), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 8RL thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent 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 violation of this permit.

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

D.2.14 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c), D.2.7, D.2.8(a), D.2.8(b), D.2.9, D.2.11(a), D.2.11(b), D.2.11(c), D.2.12(a), D.2.12(b), D.2.13(a), D.2.13(b), D.2.13(c), D.2.14(a), and D.2.14(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each month.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Record Keeping Requirements, Organic HAP Usage [40 CFR 63.829] [326 IAC 20-18-1]

(a) In order to demonstrate compliance with Condition D.2.4, pursuant to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), the Permittee shall maintain the following records on a monthly basis for each product and packaging rotogravure press:

(1) Total weight of all inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied.

(2) Total weight of organic HAP applied.

(b) The Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825.

(c) All records shall be maintained for five years. At a minimum, the most recent two (2) years of data shall be retained on site.

D.2.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.2.1(a) and D.2.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) To comply with Condition D.2.4, the owner or operator shall comply with the reporting requirements specified under 40 CFR 63.830(b)(1) and (3). On June 1, 1998, the

Permittee notified IDEM pursuant to 40 CFR 63.830(b)(1). On June 29, 2001, the Permittee notified IDEM pursuant to 40 CFR 63.830(b)(3).

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) cold cleaning degreaser unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

One (1) cold cleaning degreaser unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

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

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

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

Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the operation of the cold cleaning degreaser EU 102 is limited to 12 cycles per day and 350 days per consecutive 12-month period, with compliance determined at the end of each month.

D.3.2 PSD Requirements [326 IAC 2-2]

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC PTE of the cold cleaning degreaser EU 105 combined with the VOC input limit for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that increases the VOC PTE to 40 tons per year or greater requires prior OAQ approval.

D.3.3 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 (EU 102 and EU 105), the owner or operator 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.

The cold cleaning degreaser units EU 102 and EU 105, as manufactured and installed, satisfy the requirements of (a) through (d), provided that the units operate only when closed and are not opened until dripping has ceased.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the cold cleaning degreaser EU 105 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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°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 326 IAC 8-3-5(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°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

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

(B) A water cover when solvent 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), the owner or operator of the cold cleaning facility EU 105 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.

The cold cleaning degreaser unit EU 105, as manufactured and installed, satisfies the requirements of (a)(1), (a)(2), (a)(4), (b)(1) and (b)(2), provided that the unit operates only when closed and is not opened until dripping has ceased.

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

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain daily records in accordance with (1) through (2) below. These records shall be complete and sufficient to establish compliance with the usage limits established in Condition D.3.1.

(1) A log of the dates of use; and

(2) A daily log indicating the number of cycles run per day.

(b) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage established in Condition D.3.2.

(1) The amount and VOC content of solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month.

(3) The weight of VOC emitted for each compliance period.

(c) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.3.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**SECTION D.4 FACILITY CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units: 1) One (1) extrusion laminator; 2) One (1) coating/adhesive lamination deck; 3) One (1) coating deck; 4) Two (2) coating station dryers.

One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units: 1) Two (2) extrusion laminators; 2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour; 3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

(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.4.1 PSD Requirements [326 IAC 2-2]

(a) VOC emissions from the 6X extrusion coater/laminator (EU 204) shall be limited to less than forty (40) tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

(b) The 8RL thermal oxidizer shall be used to control VOC emissions from the 6X extrusion coater/laminator (EU 204). The thermal oxidizer shall achieve an overall control efficiency of no less than 98%.

(c) The following equation shall be used to determine VOC emissions from the 6X extrusion coater/laminator (EU 204):

$$\Sigma (U \times D \times Wt\% \ VOC) + \Sigma (C \times D \times Wt\% \ VOC) \times (1 - E)$$

Where U = Uncontrolled coating usage (gallons)
D = Coating density (pounds per gallon)
C = Controlled coating usage (gallons)
E = Overall efficiency

D.4.2 Volatile Organic Compound (VOC) Emissions Limitations [326 IAC 8-2-5] [326 IAC 8-1-2]

(a) VOC input to the 5X extrusion coater/laminator (EU 201) shall be less than 25 tons per consecutive 12-month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per year. Compliance with this limit makes 326 IAC 8-2-5 (Paper Coating Operations) not applicable.

(b) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator from the 6X coating line (EU 204).

The following conditions apply to the 6X coating line (EU 204) and the 8RL thermal oxidizer when non-compliant coatings are being used:

(c) Pursuant to 326 IAC 8-1-2(b), VOC emissions from the 6X coating line (EU 204) shall be limited to less than 4.8 pounds of VOC per gallon of coating solids. This equivalent limit was determined by using the following equation:

$$E = L / (1 - L/D)$$

Where:

| | | |
|---|---|---|
| L | = | Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating |
| D | = | Density of VOC in coating in pounds per gallon of VOC |
| E | = | Equivalent emission limit in pounds of VOC per gallon of coating solids as applied |

A solvent density of 7.36 pounds of VOC per gallon of solvent was used to determine the equivalent emission limit in pounds of VOC per gallon of coating solids as applied for the applicable emission limit contained in 326 IAC 8-2-5.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the 6X coating line (EU 204) and the 8RL thermal oxidizer shall be no less than the equivalent overall efficiency was calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

| | | |
|---|---|---|
| V | = | The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. |
| E | = | Equivalent emission limit in pounds of VOC per gallon of coating solids as applied. |
| O | = | Equivalent overall efficiency of the capture system and control device as a percentage. |

D.4.3 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 each extrusion coater/laminator, 5X (EU 201) and 6X (EU 204), and the 6X control device (8RL thermal oxidizer, described in Section D.2).

**Compliance Determination Requirements**

D.4.4 Volatile Organic Compounds (VOC) Content and Usage

(a) Compliance with the VOC content and usage limitations contained in Conditions D.4.1(a), D.4.2(a), D.4.2(b), D.4.2(c), and D.4.2(d) shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.4.1(a) and D.4.2(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.4.2(b) and D.4.2(d).

D.4.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.4.1(b) and D.4.2(d) for the 6X coating line (EU 204) and the 8RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.4.7 Compliance Monitoring Conditions for PSD

To monitor compliance with Condition D.4.1(b), the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the periods of the 8RL thermal oxidizer operation.

D.4.8 Compliance Monitoring Conditions

To monitor compliance with Conditions D.4.2(b), D.4.2(c), and D.4.2(d), pursuant to CP 081-5840-00005, issued on January 24, 1997, the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the use of the 8RL thermal oxidizer whenever non-compliant coatings are applied.

D.4.9 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F 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.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), 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 three (3) hour average temperature of the 8RL 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 violation of this permit.

D.4.10 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when:

(1) the 8RL thermal oxidizer is in operation and being used to control emissions from the 6X extrusion coater/laminator (EU 204).

(2) non-compliant coatings are being used and the 8RL thermal oxidizer is in operation.

When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent 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 violation of this permit.

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

D.4.11 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1(a), D.4.1(b), D.4.4(a), D.4.4(b), D.4.7, D.4.9(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1(a) and D.4.1(b).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Usage records shall differentiate between:

(A) uncontrolled coatings; and

(B) controlled coatings.

(3) The total VOC usage, including cleanup solvent VOC for each day. VOC usage records shall differentiate between:

(A) uncontrolled coatings; and

(B) controlled coatings.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer when coatings containing VOC are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when coatings containing VOC are being used.

(b) To document compliance with Conditions D.4.2(a), D.4.4(a), and D.4.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2(a).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of total VOC used for each compliance period.

(c) To document compliance with Conditions D.4.2(b), D.4.2(c), D.4.2(d), D.4.4(a), D.4.5, D.4.6, D.4.8, D.4.9(a), D.4.9(b), D.4.9(c), D.4.10(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2(b), D.4.2(c), and D.4.2(d).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer when non-compliant coatings are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1(a) and D.4.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within

thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

## PART 70 OPERATING PERMIT
## CERTIFICATION

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005

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

Please check what document is being certified:

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

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.<br><br>Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

**COMPLIANCE BRANCH**
**100 North Senate Avenue**
**Indianapolis, Indiana 46204**
**Phone: 317-233-5674**
**Fax: 317-233-5967**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

| | |
|---|---|
| Source Name: | Sonoco Flexible Packaging |
| Source Address: | 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124 |
| Mailing Address: | P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188 |
| Part 70 Permit No.: | T081-7183-00005 |

**This form consists of 2 pages** **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N<br>Describe:<br><br>Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6RL rotogravure printing press, EU 101
Parameter: Solvent input
Limit: 798.34 tons per consecutive 12-month period

**Months:** _____ **Year:** _____

| Reporting Period | Current Month | Previous 11 Months (Total) | 12-Month Period (TOTAL) |
|---|---|---|---|
| | Solvent Input (tons) | Solvent Input (tons) | Solvent Input (tons) |
| Quarter Month 1 | | | |
| Quarter Month 2 | | | |
| Quarter Month 3 | | | |

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 8RL Press (EU 103)
Parameter: VOC Input (tons)
Limit: 1510 tons per consecutive 12-month period VOC input to EU 103

**Months:** _____ **Year:** _____

| Month | Current Month | Previous 11 Months (Total) | 12 Month Period (TOTAL) |
|---|---|---|---|
| | Solvent Input * (tons) | Solvent Input * (tons) | Solvent Input * (tons) |
| Quarter Month 1 | | | |
| Quarter Month 2 | | | |
| Quarter 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.

* VOC input for the unit above can be calculated from the equation given below.
VOC input for 8RL Press EU 103 = [(gallons of ink used * density * weight percent VOC) + (gallons of solvent used * solvent density) + (gallons of adhesive used * adhesive density * weight percent VOC)] / 2000

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

## Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: Cold Cleaning Degreaser, EU 102
Parameter: Cycles
Limit: 12 cycles per day, 350 days per consecutive 12-month period

**Month:** _____ **Year:** _____

| Day | Number of Cycles | Day | Number of Cycles |
|---|---|---|---|
| 1 | | 17 | |
| 2 | | 18 | |
| 3 | | 19 | |
| 4 | | 20 | |
| 5 | | 21 | |
| 6 | | 22 | |
| 7 | | 23 | |
| 8 | | 24 | |
| 9 | | 25 | |
| 10 | | 26 | |
| 11 | | 27 | |
| 12 | | 28 | |
| 13 | | 29 | |
| 14 | | 30 | |
| 15 | | 31 | |
| 16 | | **Number of Days:** | |

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

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 5X extrusion coater/laminator, EU 201
Parameter: VOC input
Limit: Less than 25 tons per consecutive 12-month period

**Months:** _____ **Year:** _____

| Month | Current Month | Previous 11 Months (Total) | 12 Month Period (TOTAL) |
|---|---|---|---|
| | VOC Input (tons) | VOC Input (tons) | VOC Input (tons) |
| Quarter Month 1 | | | |
| Quarter Month 2 | | | |
| Quarter Month 3 | | | |

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6X extrusion coater/laminator, EU 204
Parameter: VOC input
Limit: 1999 tons per consecutive 12-month period

**Months:** _____ **Year:** _____

| Month | Current Month | Previous 11 Months (Total) | 12 Month Period (TOTAL) |
|---|---|---|---|
| | VOC Input (tons) | VOC Input (tons) | VOC Input (tons) |
| Quarter Month 1 | | | |
| Quarter Month 2 | | | |
| Quarter Month 3 | | | |

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005

**Months:** _____ **to** _____ **Year:** _____



| |
|---|
| This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”. |
| ☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. |
| ☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Quality

## Addendum to the Technical Support Document
## for a Minor Permit Modification to a Part 70 Operating Permit

**Source Background and Description**

| | |
|---|---|
| Source Name: | Sonoco Flexible Packaging |
| Source Location: | 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124 |
| County: | Johnson |
| SIC Code: | 3089 |
| Operation Permit No.: | T081-7183-00005 |
| Operation Permit Issuance Date: | July 1, 2003 |
| Minor Permit Modification No.: | 081-21218-00005 |
| Permit Reviewer: | LStapf |

On June 21, 2005, the Office of Air Quality (OAQ) had a notice published in the Franklin Daily Journal, in Johnson County, stating that Sonoco Flexible Packaging had applied for a Minor Permit Modification to their Title V operating permit to revise the existing emission unit EU101's overall control efficiency and the annual VOC emissions limitation for VOC (tons/year). 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 July 21, 2005, Sonoco Flexible Packaging submitted comments on the proposed Minor Permit Modification. Comments were accepted from Barnes & Thornburg, LLP of on behalf of Sonoco Flexible Packaging. The summary of the comments is as follows. **Bold** text has been added while text with a line through it has been ~~deleted~~. The Table of Contents of the permit was updated as needed. The July 21, 2005 comments are summarized in an abridged format.

**Comment 1:**

"The Draft Minor Modification should incorporate the changes made in the First Significant Permit Modification No. 081-17782-00005 issued on July 14, 2005."

**Response to Comment 1:**

Now that the First Significant Permit Modification No. 081-17782-00005 is issued, the conditions of the modification can be incorporated into this minor permit modification. Some changes need to carry through from AA 081-17977-00005. The changes include:

1) Addition of Condition B.25 Credible Evidence

2) Removal of Condition A.2 (h) and these changes (in AA 081-17977-00005)

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

---

…

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~11.2~~ **24** MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

…

(h) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

…

3) Removal of Condition D.5

4) The following heat input ratings change:

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of **24** ~~11.2~~ MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of **8.7** ~~24.0~~ MMBtu/hr, exhausting to stack 13.

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

5) Condition D.3 changes:

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) cold cleaning degreaser unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

One (1) cold cleaning degreaser unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

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

…

D.3.2 PSD Requirements [326 IAC 2-2]

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC PTE of the cold cleaning degreaser EU 105 combined with the VOC input limit for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that ~~changes~~ **increases** the VOC PTE ~~of the 8RL degreaser~~ **to 40 tons per year or greater** requires prior OAQ approval.

6) Add at the bottom of D.3.3 the following:

"The cold cleaning degreaser units EU 102 and EU 105, as manufactured and installed, satisfy the requirements of (a) through (d), provided that the units operate only when closed and are not opened until dripping has ceased."

7) Add at the bottom of D.3.4 the following:

"The cold cleaning degreaser unit EU 105, as manufactured and installed, satisfies the requirements of (a)(1), (a)(2), (a)(4), (b)(1) and (b)(2), provided that the unit operates only when closed and is not opened until dripping has ceased."

8) Make the following changes to D.4:

**SECTION D.4 FACILITY CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units: 1) One (1) extrusion laminator; 2) One (1) coating/adhesive lamination deck; 3) One (1) coating deck; 4) Two (2) coating station dryers.

One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of **8.7** ~~24.0~~ MMBtu/hr exhausting to stack 13. EU 204 consists of the following units: 1) Two (2) extrusion laminators; 2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM)

square inches per hour; 3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

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

…

D.4.1 PSD Requirements [326 IAC 2-2]

(a) VOC ~~input to~~ **emissions from** the 6X extrusion coater/laminator (EU 204) shall be limited to ~~1999~~ **less than forty (40)** tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

(b) **The 8RL thermal oxidizer shall be used to control** VOC emissions from the 6X extrusion coater/laminator (EU 204). **The thermal oxidizer shall achieve an overall control efficiency of** ~~shall be controlled by the 8RL thermal with an overall efficiency oxidizer~~ **no less than** 98%. ~~This condition satisfies the requirements of 326 IAC 8-1-2 and 326 IAC 8-2-5~~.

**(c) The following equation shall be used to determine VOC emissions from the 6X extrusion coater/laminator (EU 204):**

**$\Sigma$ (U x D x Wt% VOC) + $\Sigma$ (C x D x Wt% VOC) x (1 - E)**

**Where U = Uncontrolled coating usage (gallons)**
**D = Coating density (pounds per gallon)**
**C = Controlled coating usage (gallons)**
**E = Overall efficiency**

~~This limits potential VOC emissions from the 6X extrusion coater/laminator (EU 204) to less than 40 tons per consecutive twelve (12) month period. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the potential VOC emissions of the 6X extrusion coater/laminator (EU 204) requires prior OAQ approval.~~

D.4.2 Volatile Organic Compound (VOC) Emissions Limitations [326 IAC 8-2-5] [326 IAC 8-1-2]

…

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the 6X coating line (EU 204) and the 8RL thermal oxidizer shall be no less than ~~98%. The~~ **the** equivalent overall efficiency ~~was~~ **as** calculated by the following equation:

…

D.4.7 Compliance Monitoring Conditions for PSD

To monitor compliance with Condition D.4.1(b), the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the ~~use~~ **periods** of the 8RL thermal oxidizer **operation** ~~whenever coatings containing VOC are applied~~.

…

D.4.10 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when:

(1) ~~coatings containing VOC are being used and~~ the 8RL thermal oxidizer is in operation **and being used to control emissions from the 6X extrusion coater/laminator (EU 204).**

…

D.4.11 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1(a), D.4.1(b), D.4.4(a), D.4.4(b), D.4.7, D.4.9(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1(a) and D.4.1(b).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. **Usage records shall differentiate between:**

**(A) uncontrolled coatings; and**

**(B) controlled coatings.**

(3) The total VOC usage, including cleanup solvent VOC for each day. **VOC usage records shall differentiate between:**

**(A) uncontrolled coatings; and**

**(B) controlled coatings.**

…

**Comment 2:**

"Condition C.18(c) – General Recordkeeping Requirements contains typographical errors that should be corrected."

**Response to Comment 2:**

The text shall be revised as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

…

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) or 326 IAC 2-3-1 (z)) may result in **a** significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) ~~Prior to commencing the~~ Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:

…

**Comment 3:**

"The VOC input limitation in Condition D.2.1(a) – PSD Requirements should be revised to allow Sonoco to apply up to and including 798.34 tons per consecutive 12-month period." Paraphrased, the comment requests that the phrase 'shall be less than 798.34' is replaced with the phrase 'shall not exceed 798.34'.

**Response to Comment 3:**

A PSD Limit is established to keep emissions below the level requiring incorporation of additional requirements. Because this is a permit limit, the source shall always be limited to less than the PSD Limit or the source is in violation of its permit.

The text will remain as follows:

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall be less than 798.34 tons per consecutive 12-month period, with compliance determined at the end of each month.

**Comment 4:**

"Condition D.2.8 – Testing Requirements should not be revised because Sonoco is currently in the process of constructing a permanent total enclosure for Line 6RL, which Sonoco anticipates having completed by the current testing date of July 30, 2006. Consequently, testing prior to completion of the total enclosure would be unreasonable and an unjustified use of economic resources. Sonoco is currently required by Condition D.2.8 to conduct testing at Line 6RL between January 1, 2006 and July 30, 2006."

**Response to Comment 4:**

Because Sonoco already has a time line to install the total enclosure and to complete the necessary testing by July 30, 2006, IDEM OAQ shall restore the previous permit condition concerning the date of the testing requirement. The text shall be revised as follows:

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) ~~Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, the~~ **The** Permittee shall conduct a performance test **between January 1, 2006 and July 30, 2006** to verify compliance with the VOC control efficiency as per Conditions D.2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**Comment 5:**

"The operating temperature of the thermal oxidizer contained in Condition D.2.10(a) should not be revised because the temperature noted during the 1996 stack test is not the temperature that is recorded and monitored by Sonoco." Additional comment text was provided to justify a request that the operating temperature of the thermal oxidizer be changed to a minimum of 1,400 $^{O}$F instead of 1,887°F.

**Response to Comment 5:**

IDEM OAQ has decided that the method of recording the average combustion temperature during the 1996 stack test is not the same way that the temperature is recorded by the current electronic monitoring system. Since the recording method is different it is not a true representation of compliance to change Condition D.2.10 of the permit to the 1996 value of 1,887°F. A future stack test shall occur on or before July 30, 2006, pursuant to Condition D.2.8; therefore, the combustion temperature recorded during the stack test shall be used to satisfy Condition D.2.12 (b) at that time.

At this time the average combustion temperature shall maintain 1,400°F. The permit condition shall be modified as follows:

D.2.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of the system shall be recorded as a three (3) hour average. From the date of issuance of this permit until ~~the~~ approved stack test results **from testing conducted pursuant to Condition D.2.8(a)** are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature of ~~1,887~~ **1,400**°F.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test **conducted pursuant to Condition D.2.8(a)** that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date **of the most recently** approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test and shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 6RL 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 violation of this permit.

**Changes:**

After consideration of the comments submitted during the public notice / comment period on the draft of MPM 081-21218-00005, IDEM OAQ has revised the operating permit as attached.

# Indiana Department of Environmental Quality
# Office of Air Quality

## Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

### Source Background and Description

| | |
|---|---|
| **Source Name:** | Sonoco Flexible Packaging |
| **Source Location:** | 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124 |
| **County:** | Johnson |
| **SIC Code:** | 3089 |
| **Operation Permit No.:** | T081-7183-00005 |
| **Operation Permit Issuance Date:** | July 1, 2003 |
| **Minor Permit Modification No.:** | 081-21218-00005 |
| **Permit Reviewer:** | LStapf |

The Office of Air Quality (OAQ) has reviewed an appeal application from Sonoco Flexible Packaging for the commercial printing operation that produces coated and laminated printed packaging for food products. The appeal application relates to the following existing emission unit and control device:

One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack 11.

There will be no increase in the maximum capacity of the source as a result of this permit modification.

### History

This source is subject to Part 70 Permit Program and is a Major Source under the PSD Rules.

On May 19, 2005, Sonoco Flexible Packaging submitted an application to the OAQ requesting a revision to the existing emission unit EU101's overall control efficiency and the annual VOC emissions limitation on EU101 for VOC (tons/year). Sonoco Flexible Packaging was issued a Part 70 permit on July 1, 2003.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that this Minor Permit Modification be approved.

This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on May 19, 2005.

**Emission Calculations**

The applicant has requested to increase the VOC input from its present VOC input limit of 701.88 tons/year because upon testing the thermal oxidizer, the control device achieved a higher efficiency than the previous permit efficiency.

The existing EU101 VOC calculations are based on current permit conditions of the minimum 76% overall control efficiency and the maximum VOC pollutant load of 701.88 tons/year.

Emissions limit = maximum input VOC * (1 – overall control efficiency)

= 701.88 tons/year * (1 – 0.76) = 168.45 tons/year

The emission unit EU101 will have the same controlled emissions based on revised control efficiency. March 7, 1996, stack test indicated a destruction efficiency of 98.6% maintained at an average combustion temperature of 1,887 $^{O}$F. Capture efficiency for 6RL is 80%. Therefore:

Revised overall control efficiency = (capture efficiency * tested destruction efficiency) * 100%

= (0.80 * 0.986) * 100% = 78.9%

Emissions limit = maximum input VOC * (1 – [overall control efficiency / 100] )

168.45 tons/year = maximum input VOC * (1 – [78.9 / 100] )

maximum input VOC = 798.34 tons/ year

**Potential To Emit Before Controls (Modification)**

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

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 0 |
| PM-10 | 0 |
| $SO_2$ | 0 |
| VOC | 0 |
| CO | 0 |
| $NO_x$ | 0 |
| Single HAP | 0 |
| Total HAPs | 0 |

**Justification for Modification**

This modification will be incorporated into the Part 70 permit (T081-7183-00005) through Minor Permit Modification (081-21218-00005) for the source to operate the emission unit.

**County Attainment Status**

The source is located in Johnson County.

| County Attainment Status | |
|---|---|
| Pollutant | Status |
| $PM_{10}$ | Attainment |
| $PM_{2.5}$ | Non-Attainment |
| $SO_2$ | Attainment |
| $NO_2$ | Attainment |
| 1-Hour Ozone | Attainment |
| 8-Hour Ozone | Non-Attainment |
| CO | Attainment |

**Source Status**

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

| Pollutant | Emissions (tons/year) |
|---|---|
| PM | <100 |
| PM-10 | <100 |
| $SO_2$ | <100 |
| VOC | >250 |
| CO | <100 |
| NOx | <100 |

These emissions are based upon the Title V (T081-7183-00005) issued to the source on July 1, 2003, and Significant Source Modification (SPM 081-12310-00005) issued on November 14, 2000. This existing source is a major stationary source because at least one non-attainment regulated pollutant is emitted at a rate of 100 tons per year or more. The source is not located in a serious or severe non-attainment area for VOC nor is it located in a serious non-attainment area for PM10; therefore, fugitive emissions are not counted in determination of PTE pursuant to 326 IAC 2-3.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this modification.

40 CFR 64 Compliance Assurance Monitoring

(a) This amendment does not involve modification to a pollutant-specific emissions unit as defined in 40 CFR 64.1 for at least one of the criteria pollutant:

(1) with the potential to emit before controls equal to or greater than the major source threshold for at least one criteria pollutant;
(2) that is subject to an emission limitation or standard for at least one criteria pollutant; and
(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

**State Rule Applicability - Entire Source**

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

**State Rule Applicability - Individual Facilities**

326 IAC 2-3 Emission Offset

Johnson County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Non-attainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 non-attainment major NSR program as a surrogate to address the requirements of non-attainment major NSR for the PM2.5 NAAQS. A major source in a non-attainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Sonoco Flexible Packaging has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

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

Potential single and total HAP emissions from this modification are less than 10 and 25 tons per year, respectively. Therefore, this rule does not apply to this modification.

**Compliance Requirements**

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

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

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this emission unit are as follows:

1) Tracking the thermal oxidizer combustion temperature
2) Parametric monitoring of the duct pressure or fan amperage

**Changes Proposed**

The changes listed below are the proposed changes to the Part 70 Operating Permit (T081-7183-00005).

Correct the IDEM address in various sections to:

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

…..

**(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:**

**(1) Prior to commencing the Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:**
**(A) A description of the project.**
**(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
**(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
**(i) Baseline actual emissions;**
**(ii) Projected actual emissions;**
**(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) or 326 IAC 2-3-1(mm)(2)(A)(3)); and**
**(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.**

**(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**

**(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR**

**pollutant at the emissions unit.**

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

…..

**(g) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**

**(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and**

**(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**

……..

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr, exhausting to stack 13.

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

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

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall **be less than** ~~not exceed~~ **798.34** ~~701.88~~ tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of **78.9**~~76~~%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

….

D.2.2 Volatile Organic Compound Emission Limitations for Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5,

(a) the destruction efficiency of the 6RL thermal oxidizer shall be a minimum of ninety percent (90%).

….

D.2.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). A copy of this rule is attached.

(a) Organic HAP emissions from the rotogravure printing presses, 6RL (EU 101) and 8RL (EU 103), shall be limited to no more than four percent (4%) of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for each month.

(b) Pursuant to 40 CFR 63.825(b)(4), (f)(5), and (f)(7), the Permittee shall demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b). The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

D.2.5 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 each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), and each corresponding control device.

**Compliance Determination Requirements**

D.2.6 Thermal Oxidizer Compliance [326 IAC 8-1-2(a)]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 6RL thermal oxidizer to achieve compliance with Conditions D.2.1(b), and D.2.2(a).

…..

D.2.7 Volatile Organic Compounds (VOC) Testing Requirements [326 IAC 8-1-4(a)(3)]

Pursuant to 326 IAC 8-1-4(a)(3), the Permittee shall use Method 24 to determine compliance with the VOC content and usage limitations described under Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) ~~During the period within 30 and 36 months after issuance of this permit~~ **Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup**, the Permittee shall conduct a performance test to verify **compliance with the** VOC control efficiency as per Conditions D.2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

…..

~~D.2.9 VOC Emissions~~

~~Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of the end of each month based on the total organic solvent usage for the most recent twelve (12) month period.~~

…..

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

D.2.**10**~~11~~ Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. **For purposes of this condition, continuous shall mean temperature measurement no less than once per minute.** The output of the system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature of **1,887**°F.

…..

(c) On and after the date approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test **and shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 6RL 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 violation of this permit**.

…..

Note that with Condition D.2.9 removed, the remaining Conditions D.2.10 through D.2.17 are renumbered.

Finally, change the forms attached to the permit as follows:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

**COMPLIANCE BRANCH**
**100 North Senate Avenue**
**~~P.O. Box 6015~~**
**Indianapolis, Indiana ~~46206-6015~~ 46204**
**Phone: 317-233-5674**
**Fax: 317-233-5967**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

| | |
|---|---|
| Source Name: | Sonoco Flexible Packaging |
| Source Address: | 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124 |
| Mailing Address: | P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188 |
| Part 70 Permit No.: | T081-7183-00005 |

**This form consists of 2 pages** **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

## Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6RL rotogravure printing press, EU 101
Parameter: Solvent input
Limit: **798.34** ~~701.88~~ tons per consecutive 12-month period

**Months:** _____ **Year:** _____

| Reporting Period | Current Month | Previous 11 Months (Total) | 12-Month Period (TOTAL) |
|---|---|---|---|
| | Solvent Input (tons) | Solvent Input (tons) | Solvent Input (tons) |
| Quarter Month 1 | | | |
| Quarter Month 2 | | | |
| Quarter Month 3 | | | |

☐ No deviation occurred in this month.
☐ Deviation/s occurred in this month.
☐ Deviation has been reported on:

Submitted by:
Title/Position:
Signature:
Date:

Attach a signed certification to complete this report.

[ End of Revisions to Permit ]

**Conclusion**

The emission unit (EU101) with control device shall be subject to the conditions of the attached proposed Minor Permit Modification No. **081-21218-00005**.

# Appendix A: Emission Calculations

**Company Name:** Sonoco Flexible Packaging
**Address City IN Zip:** U.S. 31 North, Edinburg, IN 46124
**Permit No.:** 081-21218-00005
**Reviewer:** LStapf
**Date:** 13-Jun-05

**Uncontrolled Potential Emissions (tons/year)**

| Emissions Generating Activity | |
|---|---|
| Pollutant | EU101<br>Line 6RL Thermal Oxidizer |
| | |
| VOC | 798.34 |
| | |
| | |

**Controlled Potential Emissions (tons/year)**

| Emissions Generating Activity | |
|---|---|
| Pollutant | EU101<br>Line 6RL Thermal Oxidizer |
| | |
| VOC | 168.45 |
| | |

Overall control eff of 78.9% = 80% capture and 98.6% destruction eff.