



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: November 13, 2006
RE: Bemis Company, Inc. / 167-21257-00033
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
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Mr. Dan Rose
Bemis Company, Inc.
1350 North Fruitridge Avenue
Terre Haute, Indiana 47804

November 13, 2006

Re: 167-21257-00033
Third Significant Permit Modification to
Part 70 No.: T167-6182-00033

Dear Mr. Rose:

Bemis Company was issued Part 70 operating permit T167-6182-00033 on June 28, 2004 for a stationary polyethylene film production, printing, and converting source. A letter requesting changes to this permit was received on May 12, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of incorporating the PSD requirements for the following emission units permitted in PSD/Significant Source Modification 167-20981-00033:

- (1) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (2) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (3) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (4) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (5) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (6) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (7) Flexographic printing press, identified as press #19, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (8) Flexographic printing press, identified as press #20, using oxidation for control, and exhausting to

- stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (9) Flexographic printing press, identified as press #21, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
 - (10) Flexographic printing press, identified as press #22, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (11) Flexographic printing press, identified as press #23, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (12) Flexographic printing press, identified as press #24, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (13) Flexographic printing press, identified as press #25, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (14) Flexographic printing press, identified as press #27, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (15) Flexographic printing press, identified as press #28, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (16) Flexographic printing press, identified as press #29, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (17) Flexographic printing press, identified as press #30, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (18) Flexographic printing press, identified as Press 31, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (19) Flexographic printing press, identified as Press 32, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (20) Flexographic printing press, identified as Press 33, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (21) Flexographic printing press, identified as Press 34, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (22) Flexographic printing press, identified as Press 35, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12 and/or 13.
 - (23) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
 - (24) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed n 1986, using no control, and exhausting to stack 118.
 - (25) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.

- (26) One color, 2 side flexographic in-line portable printer attached to extruder #11, identified as E11, using no control, and primarily exhausting to stack 111.
- (27) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.

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

- (28) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
- (29) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (30) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (31) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (32) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
- (33) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (34) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (35) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.

All other conditions of the permit shall remain unchanged and in effect. Please find a copy of the revised Part 70 permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original Signed
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Vigo County
U.S. EPA, Region V
Vigo County Health Department
Vigo County Air Pollution Control
Air Compliance Section Inspector – Jennifer Schick
Compliance Data Section
Administrative and Development
Brian Wells –Bemis Company, Inc.



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**PART 70 OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL**

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

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T167-6182-00033	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004 Expiration Date: June 28, 2009
First Significant Permit Modification No.: 167-19669-00033, issued on June 20, 2005; and Second Significant Permit Modification No.: 167-21603-00033, issued on January 20, 2006	
Third Significant Permit Modification No.: 167-21257-00033	Pages Affected: All Renumbered from 76 pages to 83 pages
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: June 28, 2009

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- D.3.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]
- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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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) and Vigo County Air Pollution Control (VCAPC). 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 polyethylene film plant including film production, printing, and converting operations.

Responsible Official:	Plant Manager
Source Address:	1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address:	PO Box 905, Terre Haute, Indiana 47808
General Source Phone Number:	(812) 466-2213
SIC Code:	2673, 3081, and 3079
County Location:	Vigo County
Source Location Status:	Nonattainment for ozone under the 8-hour standard Maintenance Attainment for Sulfur Dioxide (SO ₂) Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Emission Offset Not 1 of 28 Source Categories

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

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

- (1) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

- (9) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (10) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (11) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (12) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (13) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (14) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (15) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (16) Flexographic printing press, identified as press #19, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (17) Flexographic printing press, identified as press #20, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (18) Flexographic printing press, identified as press #21, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (19) Flexographic printing press, identified as press #22, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (20) Flexographic printing press, identified as press #23, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (21) Flexographic printing press, identified as press #24, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (22) Flexographic printing press, identified as press #25, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (23) Flexographic printing press, identified as press #27, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (24) Flexographic printing press, identified as press #28, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (25) Flexographic printing press, identified as press #29, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (26) Flexographic printing press, identified as press #30, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (27) Flexographic printing press, identified as press #31, using oxidation as control, and exhausting to stacks 5,

- 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (28) Flexographic printing press, identified as press #32, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (29) Flexographic printing press, identified as press #33, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (30) Flexographic printing press, identified as press #34, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (31) Flexographic printing press, identified as press #35, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (32) Flexographic in-line printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
- (33) Flexographic printing press, identified as press #36, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (34) Flexographic printing press, identified as press #37, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (35) Flexographic printing press, identified as press #38, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (36) Closed Solvent Spray type parts washer exhausting to stack 20.
- (37) Cyrel plate making facility exhausting to stack 23.
- (38) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from presses #11 through #18.
- (Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)
- (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
- (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25

and #27 through #38, and exhausting to stack 9.

- (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.
- (47) Regenerative Thermal Oxidizer, identified as I13, with a maximum air flow rate of 55,000 CFM, and a maximum heat input rating of 8.6 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 13.
- (48) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (49) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (50) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (51) Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (52) Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (53) Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (54) Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (55) Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (56) Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (57) Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (58) Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

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):

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (2) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (3) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (4) AOxydry® Anti-offset powder (cornstarch) applied to printed film, insignificant PM source. [326 IAC 6-1-2]
- (5) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T167-6182-00033, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, and VCAPC upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

- (a) 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, Vigo County Air Pollution Control (VCAPC), the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Vigo County Air Pollution Control.

B.5 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.6 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.7 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.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, 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 Aresponsible official® as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept

by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ and VCAPC, 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.9 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.
- (b) 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.10 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.11 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, with submittal of the certification due by July 1 of the following year. Certifications for all subsequent years shall cover the time period from January 1 to December 31, with submittal of the certification due by July 1 of the following year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 and VCAPC, 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 and VCAPC, may require to determine the compliance status of the source.

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

B.12 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) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

The PMP extension notification does not require the certification by the Responsible official[®] as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the Responsible official[®] as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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 and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

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

VCAPC

Telephone Number: 812-462-3433
Facsimile Number: 812-462-3447

- (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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and VCAPC, 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 and VCAPC, 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.14 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 or VCAPC, 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 or VCAPC, 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 or VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T167-6182-00033 issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and Part 70 operating permit.

B.16 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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 Aresponsible 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.17 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 Aresponsible 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 and VCAPC, determine 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 and VCAPC, 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 or VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC, 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 Aresponsible 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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source-s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ and VCAPC, take 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 and VCAPC, any additional information identified as being needed to process the application.

B.19 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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Any such application shall be certified by the Aresponsible 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.20 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.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ and VCAPC, 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 Aresponsible official® as defined by 326 IAC 2-7-1(34).

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

B.22 Source Modification Requirement [326 IAC 2-7-10.5][IC 13-17-3-2]

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

B.23 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, VCAPC, 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.24 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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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.25 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 and VCAPC, 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 or VCAPC, 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.26 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 condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.2 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.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.4 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).

C.5 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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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.6 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 and VCAPC.

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 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 and VCAPC 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 and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the Permittee submits to IDEM, OAQ and VCAPC, 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.7 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.8 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 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 Aresponsible 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.9 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.

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

C.10 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 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

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

(c) If the ERP is disapproved by IDEM, OAQ and VCAPC, 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 and VCAPC, 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.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 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 and VCAPC, 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 and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline.
- (c) IDEM, OAQ and VCAPC reserve 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.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information

specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (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 or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) 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) and/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) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/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) and/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 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.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- And
- Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807
- (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 and VCAPC, 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) 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).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (1) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (37) Cyrel plate making facility exhausting to stack 23.
- (51) Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (52) Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (53) Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (54) Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (55) Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (56) Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (57) Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (58) Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (16) Flexographic printing press, identified as press #19, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (17) Flexographic printing press, identified as press #20, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (18) Flexographic printing press, identified as press #21, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (19) Flexographic printing press, identified as press #22, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (20) Flexographic printing press, identified as press #23, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (21) Flexographic printing press, identified as press #24, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (22) Flexographic printing press, identified as press #25, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (23) Flexographic printing press, identified as press #27, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (24) Flexographic printing press, identified as press #28, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (25) Flexographic printing press, identified as press #29, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (26) Flexographic printing press, identified as press #30, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (27) Flexographic printing press, identified as press #31, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (28) Flexographic printing press, identified as press #32, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (29) Flexographic printing press, identified as press #33, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (30) Flexographic printing press, identified as press #34, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (31) Flexographic printing press, identified as press #35, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating

of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.

- (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
- (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.
- (47) Regenerative Thermal Oxidizer, identified as I13, with a maximum air flow rate of 55,000 CFM, and a maximum heat input rating of 8.6 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 13.

(Note: Each individual oxidizer I5 through I12 is only capable of handling air flow from two of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time, and the RTO, I13, is capable of handling air flow from eight to twelve of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time.

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

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

D.2.1 Prevention of Significant Deterioration – Best Available Control Technology (BACT) [326 IAC 2-2]

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

- (a) Whenever any of the presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (b) The capture system for presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35 shall be considered to achieve one-hundred percent (100%) capture efficiency if the system

meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:

- (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
- (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
- (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
- (5) All access doors and windows whose areas are not included in (C) and are not included in the calculation in (D) shall be closed during routine operation of the process.
- (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:

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

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

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

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

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

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the sixteen (16) printing presses (presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35), in combination with the catalytic/regenerative thermal oxidation system, shall be operated in such a manner as to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (I5 through I12) and regenerative thermal oxidizer (I13) shall maintain a minimum destruction efficiency of 90%.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Within sixty (60) days after the start up of the new regenerative thermal oxidizer (I13), the Permittee shall conduct a performance test to verify its VOC destruction efficiency as per Conditions D.2.1 and D.2.2 utilizing methods as approved by the Commissioner. Testing of the catalytic oxidizers (I5 through I12) to verify their destruction efficiencies was performed on April 17, 2006. The destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.

Within sixty (60) days after the issuance of permit SPM 167-21257-00033, the Permittee shall conduct a performance test to verify the system capture efficiencies of the sixteen (16) printing presses (presses #19, #20,

#21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35) as per Conditions D.2.1 and D.2.2 utilizing methods as approved by the Commissioner. The capture efficiency test shall be repeated whenever a reconfiguration or change in the design of the presses in this section is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of the presses, which include any of the following:

- (a) The addition of a print station to a press,
- (b) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers), or
- (c) Changing the static duct pressure.

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

D.2.4 Oxidizer Temperature [326 IAC 2-2]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each oxidizer in the control system used to control emissions from the sixteen (16) printing presses (presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35). For the purpose of this condition, continuous means no less than once per minute, the operating temperature for the catalytic oxidizers (I5 through I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizer (I13) is the combustion zone 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 performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C –Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of any oxidizer in the control system used to control emissions from the sixteen (16) printing presses (presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35) is below the corresponding temperature in the table below. A three (3) hour average operating temperature that is below the corresponding temperature in the table below is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Oxidizer ID	Minimum 3-Hour Average Temperature (°F)
I5, I6, I7, I9, I10, I11	550
I8, I12	600
I13	1600

- (b) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid performance test that demonstrates compliance with the limits in Condition D.2.1, as approved by IDEM, OAQ and VCAPC.
- (c) On and after the date the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average operating temperature that is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Oxidizer Grouping

Catalytic oxidizers I5 through I12 and regenerative thermal oxidizer I13 have been interconnected with a common press exhaust plenum to form an oxidization control system. As a control system, the captured VOC emissions from any operating press (presses #19 through #25 and #27 through #38) is exhausted to this common press exhaust plenum and controlled by the nearest operating oxidizer(s).

Presses #19 through #25 are each rated at 4250 cfm. Presses #27 through #35 are each rated at 6375 cfm. Press #36 is rated at 4000 cfm. Presses #37 and #38 are each rated at 7000 cfm. Oxidizers I5 through I8 are each rated at 8500 cfm, Oxidizers I9 through I12 are each rated at 12750 cfm. Oxidizer I13 is rated at 55000 cfm.

To prevent an uncontrolled release of captured VOC emissions:

- (a) Before any press can operate, the total expected flow rate from all operating presses must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
- (b) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
- (c) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidization control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If the oxidization control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidation system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidation capacity is brought online or other presses are shutdown.
- (d) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
- (e) A log of all such oxidation control system malfunctions shall be kept and made available to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

D.2.6 Parametric Monitoring [326 IAC 2-2]

- (a) The Permittee shall establish the appropriate monitoring parameter for each press (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM) from the most recent performance test that demonstrates compliance with the VOC limits in Condition D.2.1 and D.2.2.
- (b) The Permittee shall maintain one of the following permanent total enclosure monitoring parameter values for each press for each day the press is operating as an indication that 100 percent capture is being attained:
 - (1) Duct pressure or fan amperage – The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test, or
 - (2) Differential pressure – The Permittee shall maintain a differential pressure at a value of – 0.007 inches of water column or less, or
 - (3) Differential pressure – The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.
- (c) The established permanent total enclosure monitoring parameter value shall be observed at least once per day for each day the press is operating.

D.2.7 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35:

- (a) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.

	Indicator #1	Indicator #2	Indicator # 3
Averaging Period	Not applicable.	Not applicable	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

(1) Rationale for Selection of Performance Indicators

Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(2) Rationale for Selection of Indicator Ranges

The selected indicator range is a differential pressure of less than - 0.007 in. w.c. This indicator range is based upon Method 204 criteria. A differential pressure of - 0.007 in. w.c. is considered equivalent to a face velocity of 200 ft/minute for natural draft openings. Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(b) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer chamber temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20°F.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection – annually • Internal inspection – annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.	Not applicable.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analysis and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(1) Rationale for Selection of Performance Indicators

The oxidizer catalyst bed inlet temperature was selected because it is indicative of the effective operation of catalytic oxidizers. It has been demonstrated that the control efficiency achieved by a catalytic oxidizer is a function of the catalyst temperature and associated catalyst activity. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected.

Periodically sampling and testing of the catalyst activity will assure that the catalyst will function properly when the minimum bed temperature is maintained. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the catalyst inlet bed control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the catalyst bed is established at the operating temperature maintained during a performance test. Each oxidizer includes a temperature controller that maintains the desired catalyst bed temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

(c) Monitoring Approach For The Regenerative Thermal Oxidizer:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test

	Indicator #1	Indicator #2	Indicator #3
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^\circ\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^\circ\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External Inspection – annually Internal inspection – annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

(1) Rationale for Selection of Performance Indicators

The oxidizer combustion zone temperature was selected because it is indicative of a regenerative thermal oxidizer's operation. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected. If the combustion zone temperature decreases significantly, complete combustion may not occur.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once during the permit term to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer combustion zone temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The oxidizer includes a temperature controller that maintains the desired combustion zone temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

D.2.8 Monitoring [326 IAC 2-2]

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the sixteen (16) printing presses (presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35). If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11, I12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permitted shall take reasonable response steps in accordance with Section C - Response to Excursions or Accidences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.4, and D.2.6, the Permittee shall maintain records in accordance with (1) and (2) below:
- (1) Continuous inlet temperature to the catalyst bed (reduced to a three-hour average basis) for catalytic oxidizers I5 through I12, and the combustion zone temperature for the regenerative thermal oxidizer I13 (reduced to a three-hour average basis) and the three (3) hour average inlet temperature to the catalyst bed and the three (3) hour average combustion zone temperature used to demonstrate compliance during the most recent compliant performance test.
- (2) Daily records of the permanent total enclosure monitoring parameter value (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM, OAQ and VCAPC).

- (b) To document compliance with Condition D.2.8 the Permittee shall maintain records of inspections or sample. These records shall include as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions taken (if any are required).
- (c) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (33) Flexographic printing press, identified as press #36, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
- (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
- (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.
- (47) Regenerative Thermal Oxidizer, identified as I13, with a maximum air flow rate of 55,000 CFM, and a maximum heat input rating of 8.6 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 13.

(Note: Each individual oxidizer I5 through I12 is only capable of handling air flow from two of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time, and the RTO, I13, is capable of handling air flow from eight to twelve of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time.

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

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

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

Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through this Part 70 permit, the following conditions apply:

- (a) The annual VOC usage on press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{Printing VOC usage}) * (1 - \text{overall control efficiency}) + \text{Cleanup VOC loss} \# 39.99 \text{ tons}$. Compliance with this condition shall make this press not subject to the provisions of 326 IAC 2-2, Prevention of Significant Deterioration (PSD).
- (b) Whenever press #36 is applying VOC containing materials, the press exhaust shall be vented through the operating oxidation control system. The press shall maintain a minimum overall control efficiency of 80.75% for VOC emissions.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture system on press #36, in combination with the catalytic/regenerative thermal oxidation system, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (I5 through I12) and regenerative thermal oxidizer (I13) shall maintain a minimum destruction efficiency of 90%.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

Within sixty (60) days after the start up of the new regenerative thermal oxidizer (I13), the Permittee shall conduct a performance test to verify its VOC destruction efficiency as per Conditions D.3.1 and D.3.2. Testing of the catalytic oxidizers (I5 through I12) to verify their destruction efficiencies was performed on April 17, 2006. The destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.

The capture efficiency test performed on October 27, 2004 for press #36, shall be repeated whenever a reconfiguration or change in its design is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of this press, which include any of the following:

- (a) The addition of a print station to the press,
- (b) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers), or
- (c) Changing the static duct pressure.

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

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

- (a) Compliance with the VOC limitations contained in Conditions D.3.1 shall be determined by tracking all VOC usage (including but not limited to inks, solvents, additives, and clean-up solvents) by press #36. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to press #36.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the oxidizer system (I5 through I13) to achieve compliance with conditions D.3.1 and D.3.2.

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

D.3.5 Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the operating temperature of each oxidizer in the control system used to control emissions from press #36. For the purpose of this condition, continuous means no less than once per minute, the operating temperature for the catalytic oxidizers (I5 through I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizer (I13) is the combustion zone 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 performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C -Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of any oxidizer in the control system used to control emissions from press #36 is below the corresponding temperature in the table below. A three (3) hour average operating temperature that is below the corresponding temperature in the table below is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

Oxidizer ID	Minimum 3-Hour Average Temperature (°F)
I5, I6, I7, I9, I10, I11	550
I8, I12	600
I13	1600

- (b) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid performance test that demonstrates compliance with the VOC limit in Condition D.3.1, as approved by IDEM, OAQ and VCAPC.
- (c) On and after the date the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average operating temperature that is below the three (3) hour average temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.6 Oxidizer Grouping

Catalytic oxidizers I5 through I12 and regenerative thermal oxidizer I13 have been interconnected with a common press exhaust plenum to form an oxidization control system. As a control system, the captured VOC emissions from any operating press (presses #19 through #25 and #27 through #38) is exhausted to this common press exhaust plenum and controlled by the nearest operating oxidizer(s).

Presses #19 through #25 are each rated at 4250 cfm. Presses #27 through #35 are each rated at 6375 cfm. Press #36 is rated at 4000 cfm. Presses #37 and #38 are each rated at 7000 cfm. Oxidizers I5 through I8 are each rated at 8500 cfm, Oxidizers I9 through I12 are each rated at 12750 cfm. Oxidizer I13 is rated at 55000 cfm.

To prevent an uncontrolled release of captured VOC emissions:

- (a) Before any press can operate, the total expected flow rate from all operating presses must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
- (b) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
- (c) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidization control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If

the oxidization control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidization system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidization capacity is brought online or other presses are shutdown.

- (d) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
- (e) A log of all such oxidization control system malfunctions shall be kept and made available to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

D.3.7 Parametric Monitoring

- (a) The Permittee shall establish the appropriate monitoring parameter for press #36 (duct pressure, or fan amperage, or other parameter as approved by IDEM, OAQ and VCAPC) from the most recent performance test that demonstrates compliance with the limits in Conditions D.3.1 and D.3.2.
- (b) The Permittee shall maintain one of the following monitoring parameter values for each press for each day the press is operating as an indication that capture is being attained:
 - (1) Duct pressure or fan amperage – The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test.
- (c) The established monitoring parameter value shall be observed at least once per day for each day the press is operating.

D.3.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for press #36:

(a) Monitoring Approach For Unenclosed Presses

	Indicator # 1	Indicator #2	Indicator #3 ^a
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks, including: <ul style="list-style-type: none"> • between color dryer flow; and • tunnel oven flow. 	Use a smoke stick or equivalent approach to assure that the dryer is negative to the surrounding atmosphere.
II. Indicator Range	An excursion is defined as any finding that the integrity of the exhaust system has been compromised.	Establish the proper interlock sensor location at the time of installation. Document proper operation during the capture efficiency test. An excursion is defined as any finding that any interlocks are inoperative.	Case-by-case determination of appropriate compliance demonstration technique. An excursion is defined as any operation of the press without proper placement of dryer cans being demonstrated.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting	Press shall not be operated until proper placement of dryer cans is demonstrated. Each excursion triggers an assessment of the problem, and corrective action.

requirement.			
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that dampers are correctly positioned. Inspections will identify problems.	Monitoring approach will assure the dryer is set to properly contain supply air.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable
C. QA/QC Practices and Criteria		Validate functionality of between color dryer and tunnel oven exhaust flow sensors by proving proper operation, annually.	
D. Monitoring Frequency	Quarterly	Annually.	Whenever the location of the dryer is disrupted. (This may not be necessary for two piece dryers.)
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations	Not applicable
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

^a Indicator #3 is only necessary for unenclosed presses with variable placement settings for the between color dryer cans.

(1) Rationale for Selection of Performance Indicators

Press dryers are designed to operate under negative pressure and comprise the capture system of the Process line. The dryer system and the airflow through the system is an integral part of the process designed by the manufacturer. A properly balanced air system must be maintained in order to assure proper drying of the inks and coatings and product quality. Furthermore, a properly balanced air system must be maintained in order to assure that the exhaust gas is maintained well below the LEL. In order to meet fire insurance requirements, most exhaust ducts typically are fitted with LEL sensors (required if LEL goes above 25 percent) and alarms and with flow sensors that will trigger a shutdown if the sensor activates due to a flow fault, typically a fraction of the LEL. Assuring the flow sensor interlocks are properly set and operating will assure the airflow through the system is properly maintained, the press is operating as designed, and the design capture efficiency is achieved.

Inspections of the ductwork and dampers will ensure their integrity.

When necessary after equipment maintenance, or adjustment, a smoke test will verify capture (negative flow from the atmosphere into the exhaust system) at the test location.

(2) Rationale for Selection of Indicator Ranges

An initial performance test is conducted on the unenclosed press to demonstrate compliance with the capture efficiency required in the air pollution permit or as guaranteed by the manufacturer. The exhaust system flow rate also is documented during the capture efficiency test.

The level at which the low-flow sensor interlock activates is established by the manufacturer at the time of installation. It is set at a level to assure proper operation of the press and to maintain operation of the exhaust system. Maintaining airflow above this level assures the press is properly operating and provides a reasonable assurance that the capture efficiency is being maintained.

(b) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer chamber temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection – annually • Internal inspection – annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analyses and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(1) Rationale for Selection of Performance Indicators

The oxidizer catalyst bed inlet temperature was selected because it is indicative of the effective operation of catalytic oxidizers. It has been demonstrated that the control efficiency achieved by a catalytic oxidizer is a function of the catalyst temperature and associated catalyst activity. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected.

Periodically sampling and testing of the catalyst activity will assure that the catalyst will function properly when the minimum bed temperature is maintained. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the catalyst inlet bed control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the catalyst bed is established at the operating temperature maintained during a performance test. Each oxidizer includes a temperature controller that maintains the desired catalyst bed temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

(c) Monitoring Approach For The Regenerative Thermal Oxidizer:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^\circ\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^\circ\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External inspection – annually. Internal inspection – annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.

	Indicator #1	Indicator #2	Indicator #3
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly	Annually.	For each performance test conducted.

(1) Rationale for Selection of Performance Indicators

The oxidizer combustion zone temperature was selected because it is indicative of a regenerative thermal oxidizer's operation. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected. If the combustion zone temperature decreases significantly, complete combustion may not occur.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once during the permit term to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer combustion zone temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The oxidizer includes a temperature controller that maintains the desired combustion zone temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

D.3.9 Monitoring

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of press #36. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11, I12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation

from this permit.

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

D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for each press.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient 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 month; and
 - (4) The weight of VOCs emitted for each compliance period from press #36 using methods identified in condition D.3.4.

- (b) To document compliance with Conditions D.3.1, D.3.2, D.3.4, D.3.5, and D.3.7, the Permittee shall maintain records in accordance with (1) and (2) below:
 - (1) Continuous inlet temperature to the catalyst bed (reduced to a three-hour average basis) for catalytic oxidizers I5 through I12, and the combustion zone temperature for the regenerative thermal oxidizer I13 (reduced to a three-hour average basis) and the three (3) hour average inlet temperature to the catalyst bed and the three (3) hour average combustion zone temperature used to demonstrate compliance during the most recent compliant performance test.
 - (2) Daily records of the monitoring parameter value (duct pressure, or fan amperage, or other parameter as approved by IDEM, OAQ and VCAPC).

- (c) To document compliance with Condition D.3.9, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).

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

D.3.11 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.3.1 shall be submitted quarterly to the addresses 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 Aresponsible official® as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (32) Flexographic in-line portable printer attached to extruder #11, identified as E11, using no control, and primarily exhausting to stack 111.
- (48) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (49) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (50) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.

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

- (a) The annual VOC usage on In-Line Press E-11 shall not exceed 24.9 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this condition shall make In-Line Press E-11 not subject to 326 IAC 8-5-5 (Graphic Arts Operation).
- (b) Pursuant to 326 IAC 8-5-5, In-Line Presses E17, E18, and E19, shall be controlled by a VOC control device with ninety percent (90%) reduction efficiency, and a capture system efficiency sufficient to achieve an overall control efficiency of sixty percent (60%).

Compliance Determination Requirements

D.4.2 Compliance Plan [326 IAC 8-5-5]

In-Line Presses, E-17, E-18, and E-19, are not in compliance with the requirements of 326 IAC 8-5-5 and Condition D.4.1(b). The Permittee shall comply with the following Compliance Plan:

- (a) Shutdown and dismantle the three (3) In-Line Presses, E-17, E-18, and E-19 by December 31, 2006.
- (b) The Permittee shall notify IDEM, OAQ on the compliance status of these in-line presses by January 10, 2007.

D.4.3 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.4.1(a) shall be determined by tracking all VOC usage (including but not limited to inks, solvents, additives, and clean-up solvents) for press E11. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to this press.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit

established in Condition D.4.1(a).

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for press E-11 monthly.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient 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 month; and
 - (4) The weight of VOCs emitted for each compliance period using methods identified in condition D.4.3.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.5 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.4.1(a) shall be submitted quarterly to the addresses 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 Aresponsible official® as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

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

- (8) Flexographic printing press, identified as press #11, using catalytic oxidation for control and exhausting to stacks 1, 2, 3, and /or 4;
- (9) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (10) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (11) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (12) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (13) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (14) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (15) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (38) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr), are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.

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

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

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

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

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

- (a) Whenever any of the presses #11, #12, #13, #14, #15, #16, #17, and #18 is applying VOC containing materials, each press exhaust must be vented through the operating catalytic oxidation control system, I1 through I4. Each press shall have a capture system efficiency of 100%. The catalytic oxidation control system shall have a minimum destruction efficiency of 95%.
- (b) The capture efficiency system for presses #11, #12, #13, #14, #15, #16, #17, and #18 shall be considered to achieve one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
 - (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.

- (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
- (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
- (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
- (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:

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

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

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

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

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

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for flexographic printer identified as presses #11 through #18 in combination with the catalytic oxidation system shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the four (4) catalytic oxidizers (I1 through I4) shall maintain a minimum destruction efficiency of 90%.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Testing of the catalytic oxidizers (I1 through I4) to verify their destruction efficiencies was performed on June 27, 2005. The oxidizers' destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.

Within sixty (60) days after the issuance of permit SPM 167-21257-00033, the Permittee shall conduct a performance test to verify the system capture efficiencies of the six (6) printing presses (presses #13, #14, #15, #16, #17, and #18) as per Conditions D.5.1 and D.5.2 utilizing methods as approved by the Commissioner. Testing of presses #11 and #12 to verify their system captures efficiencies was performed on June 27, 2005. The capture efficiency test shall be repeated whenever a reconfiguration or change in the design of the presses in this section is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of these presses, which include any of the following:

- (a) The addition of print station to a press,
- (b) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers), or

- (c) Changing the static duct pressure.

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

D.5.4 Oxidizer Temperature [326 IAC 2-2]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the temperature at the inlet to the catalyst bed of each catalytic oxidizer in the control system used to control emissions from eight (8) printing presses (presses #11, #12, #13, #14, #15, #16, #17, and #18). For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C –Response to Excursions or Exceedances whenever the three (3) hour average inlet temperature to the catalyst bed of any catalytic oxidizer in the control system used to control emissions from the eight (8) printing presses (presses #11, #12, #13, #14, #15, #16, #17, and #18) is below 550 °F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature at the inlet to the catalyst bed of each catalytic oxidizer from the most recent valid performance test that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM, OAQ and VCAPC.
- (c) On and after the date the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature at the inlet to the catalyst bed of any catalytic oxidizer is below the three (3) hour average temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.5.5 Oxidizer Grouping

Catalytic oxidizers I1 through I4 have been interconnected with a common press exhaust plenum to form an oxidation control system. As a control system, the captured VOC emissions from any operating press (presses #11 through #18) is exhausted to this common press exhaust plenum and controlled by the nearest operating oxidizer(s).

Presses #11 through #18 are each rated at 3500 cfm. Oxidizers I1 through I4 are each rated at 7000 cfm,

To prevent an uncontrolled release of captured VOC emissions:

- (a) Before any press can operate, the total expected flow rate from all operating presses must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
- (b) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
- (c) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidation control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If the oxidation control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidation system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidation capacity is brought online or other presses are shutdown.

- (d) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
- (e) A log of all such oxidation control system malfunctions shall be kept and made available to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

D.5.6 Parametric Monitoring

- (a) The Permittee shall establish the appropriate monitoring parameter for each press (duct pressure, or fan amperage or differential pressure, or other parameter as approved by IDEM, OAQ and VCAPC) from the most recent performance test that demonstrates compliance with limits in Conditions D.5.1 and D.5.2.
- (b) The Permittee shall maintain one of the following permanent total enclosure monitoring parameter values for each press for each day the press is operating as an indication that 100 percent capture is being attained:
 - (1) Duct pressure or fan amperage – The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test, or
 - (2) Differential pressure – The Permittee shall maintain a differential pressure at a value of – 0.007 inches of water column or less, or
 - (3) Differential pressure – The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.
- (c) The established permanent total enclosure monitoring parameter value shall be observed at least once per day for each day the press is operating.

D.5.7 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for presses #11, #12, #13, #14, #15, #16, #17, and #18:

- (a) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.

	Indicator #1	Indicator #2	Indicator # 3
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspections, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.

	Indicator #1	Indicator #2	Indicator # 3
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly.	Annually.	Quarterly

(1) Rationale for Selection of Performance Indicators

Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(2) Rationale for Selection of Indicator Ranges

The selected indicator range is a differential pressure of less than - 0.007 in. w.c. This indicator range is based upon Method 204 criteria. A differential pressure of - 0.007 in. w.c. is considered equivalent to a face velocity of 200 ft/minute for natural draft openings. Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(b) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer chamber temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^{\circ}\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection – annually • Internal inspection – annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analyses and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(1) Rationale for Selection of Performance Indicators

The oxidizer catalyst bed inlet temperature was selected because it is indicative of the effective operation of catalytic oxidizers. It has been demonstrated that the control efficiency achieved by a catalytic oxidizer is a function of the catalyst temperature and associated catalyst activity. By

maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected.

Periodically sampling and testing of the catalyst activity will assure that the catalyst will function properly when the minimum bed temperature is maintained. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the catalyst inlet bed control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the catalyst bed is established at the operating temperature maintained during a performance test. Each oxidizer includes a temperature controller that maintains the desired catalyst bed temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

D.5.8 Monitoring [326 IAC 2-2]

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each press #11, #12, #13, #14, #15, #16, #17, and #18. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the four (4) catalytic oxidizers (I1, I2, I3, and I4) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Accidences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2, D.5.4, and D.5.6 the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) The continuous inlet temperature to the catalyst bed (reduced to a three-hour average basis) for the catalytic oxidizers I1 through I4 and the three (3) hour average inlet temperature to the catalyst bed used to demonstrate compliance during the most recent compliant performance test.
 - (2) Daily record of the permanent total enclosure monitoring parameter value (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM, OAQ and VCAPC).
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain records of inspections or sample. These records shall include as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required)

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

Section D.6

FACILITY OPERATION CONDITIONS

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

- (34) Flexographic printing press, identified as press #37, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13;
- (35) Flexographic printing press, identified as press #38, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, and/or 13.
- (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
- (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
- (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.
- (47) Regenerative Thermal Oxidizer, identified as I13, with a maximum air flow rate of 55,000 CFM, and a maximum heat input rating of 8.6 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 13.

(Note: Each individual oxidizer I5 through I12 is only capable of handling air flow from two of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time, and the RTO, I13, is capable of handling air flow from Eight to twelve of the nineteen (19) presses (#19 through #25 and #27 through #38) at a time.

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

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

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

- (a) Pursuant to SSM 167-21605-00033, issued on January 5, 2006, and revised through this Part 70 permit, the annual VOC usage on press #37 and press #38 combined shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (Printing VOC usage) * (1 - overall control efficiency) + Cleanup VOC loss # 39.99 tons. Compliance with this condition shall make these two presses not subject to the provisions of 326 IAC 2-2, Prevention of Significant Deterioration
- (b) Whenever press #37 or press #38 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (c) The capture efficiency system for presses #37 and #38 shall be considered to achieve one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
 - (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
 - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
 - (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
 - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
 - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:

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

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

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

Compliance with this condition shall make 326 IAC 2-2 (PSD) not applicable.

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for the flexographic printers identified as press #37 and press #38 in combination with the catalytic/regenerative thermal oxidation system shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.

- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (I5 through I12) and regenerative thermal oxidizer (I13) shall maintain a minimum destruction efficiency of 90%.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

Within sixty (60) days after the start up of the new regenerative thermal oxidizer (I13), the Permittee shall conduct a performance test to verify its VOC destruction efficiency as per Conditions D.6.1 and D.6.2. Testing of the catalytic oxidizers (I5 through I12) to verify their destruction efficiencies was performed on April 17, 2006. The destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.

The capture efficiency test performed on April 17, 2006 for presses #37 and #38 shall be repeated whenever a reconfiguration or change in the design of the presses in this section is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of these presses, which include any of the following:

- (a) The addition of a print station to a press,
- (b) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers), or
- (c) Changing the static duct pressure.

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

D.6.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Compliance with the VOC limitations contained in Conditions D.6.1 shall be determined by tracking all VOC usage (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the oxidizer system (I5 through I13) to achieve compliance with conditions D.6.1 and D.6.2.

D.6.5 Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the operating temperature of each oxidizer in the control system used to control emissions from press #37 and press #38. For the purpose of this condition, continuous means no less than once per minute, the operating temperature for the catalytic oxidizers (I5 through I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizer (I13) is the combustion zone 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 performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C –Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of any oxidizer in the control system used to control emissions from press #37 and press #38 is below the corresponding temperature in the table below. A three (3) hour average operating temperature that is below the respective value is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Oxidizer ID	Minimum 3-hour Average Temperature (°F)
I5, I6, I7, I9, I10, I11	550
I8, I12	600
I13	1600

- (b) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid stack test that demonstrates compliance with limits in Condition D.6.1, as approved by IDEM, OAQ and VCAPC.
- (c) On and after the date the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.6.6 Oxidizer Grouping

Catalytic oxidizers I5 through I12 and regenerative thermal oxidizer I13 have been interconnected with a common press exhaust plenum to form an oxidization control system. As a control system, the captured VOC emissions from any operating press (presses #19 through #25 and #27 through #38) is exhausted to this common press exhaust plenum and controlled by the nearest operating oxidizer(s).

Presses #19 through #25 are each rated at 4250 cfm. Presses #27 through #35 are each rated at 6375 cfm. Press #36 is rated at 4000 cfm. Presses #37 and #38 are each rated at 7000 cfm. Oxidizers I5 through I8 are each rated at 8500 cfm, Oxidizers I9 through I12 are each rated at 12750 cfm. Oxidizer I13 is rated at 55000 cfm.

To prevent an uncontrolled release of captured VOC emissions:

- (a) Before any press can operate, the total expected flow rate from all operating presses must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
- (b) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
- (c) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidization control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If the oxidization control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidation system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidation capacity is brought online or other presses are shutdown.
- (d) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
- (e) A log of all such oxidation control system malfunctions shall be kept and made available to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

D.6.7 Parametric Monitoring

- (a) The Permittee shall establish the appropriate monitoring parameter for presses #37 and #38 (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM) from the most recent performance test that demonstrates compliance with the limits in Conditions D.6.1 and D.6.2.

- (b) The Permittee shall maintain one of the following permanent total enclosure monitoring parameter values for each press for each day the press is operating as an indication that 100 percent capture is being attained:
- (1) Duct pressure or fan amperage – The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test, or
 - (2) Differential pressure – The Permittee shall maintain a differential pressure at a value of – 0.007 inches of water column or less, or
 - (3) Differential pressure – The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.
- (c) The established permanent total enclosure monitoring parameter value shall be observed at least once per day for each day the press is operating.

D.6.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for presses #37 and #38:

(a) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			

	Indicator #1	Indicator #2	Indicator # 3
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspections, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

(1) Rationale for Selection of Performance Indicators

Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(2) Rationale for Selection of Indicator Ranges

The selected indicator range is a differential pressure of less than - 0.007 in. w.c. This indicator range is based upon Method 204 criteria. A differential pressure of - 0.007 in. w.c. is considered equivalent to a face velocity of 200 ft/minute for natural draft openings. Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

(b) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
	Catalyst bed inlet temperature.	Work practice/inspection	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer chamber temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20°F.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection – annually • Internal inspection – annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analyses and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(1) Rationale for Selection of Performance Indicators

The oxidizer catalyst bed inlet temperature was selected because it is indicative of the effective operation of catalytic oxidizers. It has been demonstrated that the control efficiency achieved by a catalytic oxidizer is a function of the catalyst temperature and associated catalyst activity. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected.

Periodically sampling and testing the catalyst activity will assure that the catalyst will function properly when the minimum bed temperature is maintained. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the catalyst inlet bed control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the catalyst bed is established at the operating temperature maintained during a performance test. Each oxidizer includes a temperature controller that maintains the desired catalyst bed temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

(c) Monitoring Approach For The Regenerative Thermal Oxidizer:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^{\circ}\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection – annually. • Internal inspection – annually. 	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.

	Indicator #1	Indicator #2	Indicator #3
Frequency	Quarterly	Annually.	For each performance test conducted.

(1) Rationale for Selection of Performance Indicators

The oxidizer combustion zone temperature was selected because it is indicative of a regenerative thermal oxidizer's operation. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected. If the combustion zone temperature decreases significantly, complete combustion may not occur.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once during the permit term to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

(2) Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer combustion zone temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The oxidizer includes a temperature controller that maintains the desired combustion zone temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

D.6.9 Monitoring

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the two (2) Presses #37 and #38. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11, I12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.6.10 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for each press.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient 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 month; and
 - (4) The weight of VOCs emitted for each compliance period from Presses #37 and #38 using methods identified in Condition D.6.4.
- (b) To document compliance with Conditions D.6.1, D.6.2, D.6.4 and D.6.7, the Permittee shall maintain records in accordance with (1) and (2) below.
- (1) Continuous inlet temperature to the catalyst bed (reduced to a three-hour average basis) for catalytic oxidizers I5 through I12, and the combustion zone temperature for the regenerative thermal oxidizer I13 (reduced to a three-hour average basis) and the three (3) hour average inlet temperature to the catalyst bed and the three (3) hour average combustion zone temperature used to demonstrate compliance during the most recent compliant performance test.
 - (2) Daily records of the permanent total enclosure monitoring parameter value (duct pressure, or fan amperage or differential pressure, or other parameter as approved by IDEM, OAQ and VCAPC).
- (c) To document compliance with Condition D.6.9, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).
- (d) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

D.6.11 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.6.1 shall be submitted to the addresses 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 Aresponsible official® as defined by 326 IAC 2-7-1(34).

SECTION D.7

FACILITY CONDITIONS

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

(36) Closed Solvent Spray type parts washer exhausting to stack 20.

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

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

D.7.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.2 Volatile Organic Compounds (VOC) [326 8-3-5]

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

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°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

subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.8

FACILITY CONDITIONS

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

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (3) AOxydry® Anti-offset powder (cornstarch) applied to printed film, insignificant PM source. [326 IAC 6-1-2]
- (4) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

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

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

D.8.1 Particulate Emission Limitations [326 IAC 6-1-2]

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section and VCAPC: 812-462-3433); and
 - C** The Permittee must submit notice in writing or by facsimile within two (2) working days (IDEM Facsimile Number: 317-233-5967 and VCAPC Facsimile Number: 812-462-3447), 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 Describe:
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
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-6182-00033
 Facility: Press #36
 Parameter: VOC emission
 Limit: Not to exceed 39.99 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Press #36		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total
1			
2			
3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
 Source Address: 350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-6182-00033
 Facility: Press #37 and Press #38
 Parameter: VOC emission
 Limit: Combined emissions not to exceed 39.99 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Press #37 and Press #38 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total
1			
2			
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
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: In-line Press E11
Parameter: VOC usage from E11
Limit: E11 - not to exceed 24.9 tons per 12 consecutive month period
Compliance from all limits with the limit shall be determined at the end of each month

QUARTER: _____ YEAR: _____

Month	E11-VOC Usage This Month (tons)	E11-VOC Usage for Past 11 Months (tons)	E11-VOC Usage for 12 Month Period (tons)
1			
2			
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
and
VIGO COUNTY AIR POLLUTION CONTROL**

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

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033

Months: _____ to _____ Year: _____

Page 1 of 2

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 .	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> 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.