



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: September 7, 2007
RE: Pro Edge / 089-21286-00447
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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**ProEdge, Inc.
23326 Shelby Road
Shelby, Indiana 46377**

(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. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

Operation Permit No.: F089-21286-00447	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 7, 2007 Expiration Date: September 7, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary packaging rotogravure printing operation.

Source Address:	23326 Shelby Road, Shelby, Indiana 46377
Mailing Address:	P.O. Box 201, Shelby, IN 46377
General Source Phone Number:	(219) 552-9550
SIC Code:	2754
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001, constructed in 2002, with a maximum line speed of 620 feet per minute (ft/min), one (1) natural gas fired press dryer oven system, constructed in 2002, with combined heat input rate of 8.65 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a permanent total enclosure vented to catalytic oxidizer, constructed in 2002, with a heat input capacity of 8.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Six (6) natural gas-fired space heaters with a combined heat input rate of 1.09 MMBtu per hour;
- (b) Application of oils, greases, lubricants or other non volatile materials applied as temporary protective coatings;

- (c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (d) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on site sewage treatment facility;
- (g) Paved and unpaved roads and parking lots with public access;
- (h) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
- (i) Combustion source flame safety purging on startup;
- (j) Closed loop heating and cooling systems;
- (k) Blowdown for any of the following:
 - (1) boiler;
 - (2) sight glass;
 - (3) compressors;
 - (4) pumps; and
 - (5) cooling tower;
- (l) 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;
- (m) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons;
- (n) Mixers operating on open or closed, vented containers with a capacity of less than 200 gallons; and
- (o) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, F089-21286-00447, 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, 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, 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 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (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 an "authorized individual" 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F089-21286-00447 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-8-15(b) through (d). 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 in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 twenty percent (20%) 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.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 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.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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; and/or
 - (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 Emission Statement [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty – five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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 on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001, constructed in 2002, with a maximum line speed of 620 feet per minute (ft/min), one (1) natural gas fired press dryer oven system, constructed in 2002, with combined heat input rate of 8.65 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a permanent total enclosure vented to catalytic oxidizer, constructed in 2002, with a heat input capacity of 8.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

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

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

D.1.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
- (1) The catalytic oxidizer control device associate with packaging rotogravure printing press, Cerutti # 1, shall maintain a minimum operating temperature of 625°F or at least a temperature determined in the most recent compliance test (described in Condition D.1.5) to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
- (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.
- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.1.2 Volatile Organic Chemicals [326 IAC 2-8] [326 IAC 2-3]

The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press, Cerutti #001, when applying solvent based materials, shall be limited to less than 600.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96.0%. The usage limitation in combination with control device is necessary to limit VOC emissions from the printing press, Cerutti #001, to less than 24.00 tons per twelve (12) consecutive month period. Compliance with these limits will satisfy 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-2 (PSD) not applicable.

D.1.3 Hazardous Air Pollutant (HAP) [326 IAC 2-8] [326 IAC 2-4.1-1] [326 IAC 2-7]

- (a) The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 247.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96.0%. The usage limitation in combination with control device is necessary to limit single HAP emissions from the printing press, Cerutti #001, to less than 9.90 tons per twelve (12) consecutive month period.
- (b) The total input of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 618.75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96.0%. The usage limitation in combination with control device is necessary to limit emissions of any combination of HAPs from the printing press, Cerutti #001, to less than 24.90 tons per twelve (12) consecutive month period.

Compliance with the above limits will satisfy 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each oxidation control system shall be tested according to the following schedule and in the following situations:
 - (1) No later than thirty (30) months from September 7, 2005, a compliance test shall be conducted. This test shall be repeated at least once every thirty (30) months from the date of this valid compliance demonstration.
 - (2) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (3) A compliance test shall be performed within ninety (90) days of:
 - (A) Startup of a new coating facility;

- (B) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
- (C) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (4) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (A) Test procedures;
 - (B) Operating and control system parameters;
 - (C) Type of VOC containing process material being used; and
 - (D) The process and control system parameters that will be monitored during the test.
- (b) In conjunction with the compliance test required by D.1.5(a)(1) and at least every thirty (30) months thereafter, the permittee shall remove the primary catalyst from each oven and have the catalyst vendor conduct a catalyst activity analysis. Catalysts with percent activity less than the catalyst activity measured during the compliance test must be replaced or a stack test must be conducted to show that 96.0% overall efficiency is being achieved.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the catalytic oxidizer to be able to achieve compliance with Conditions D.1.1.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Volatile Organic Compounds (VOC) and HAP Control

The catalytic oxidizer controlling VOC and HAP emissions from the printing press shall be in operation at all times that these units are in operation to ensure compliance with conditions D.1.1, D.1.2 and D.1.3.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

When a catalytic oxidizer is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each oxidizer shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

D.1.11 Catalyst Replacement Inspections

The Permittee shall inspect the catalyst activity level at least every twelve (12) months. If there are indications of excess fouling or excess catalyst degradation, the Permittee shall test the catalyst activity or replace the catalyst.

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

D.1.12 Record Keeping Requirements [326 IAC 2-3] [326 IAC 8-5-5] [326 IAC 2-8]

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) below shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.2 and the single HAP and combined HAPs emission limits established in Conditions D.1.3
- (1) The amount and VOC and HAP content of each coating material and solvent used.
 - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.
 - (3) A log of the dates of use;
 - (4) The total VOC, single HAP and combined HAPs usage for each month;
 - (5) The weight of VOCs, single HAP and combined HAPs emitted for each compliance period; and
 - (6) The following operation parameters of catalytic oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency of the control devices;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and
 - (D) Continuous temperature readings.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
- (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

- (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.1.5 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (6) Catalytic oxidizer monitoring data as follows:
 - (A) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the oxidizer;
 - (B) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance. The Permittee shall include in its records the type of coating being run in the printing press operation during each 3 hour period in which this occurs.; and
 - (C) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance. The Permittee shall include in its records the type of coating being run in the printing press operation during each 3 hour period in which this occurs.
 - (7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit, and 326 IAC 8-1-9(c).

D.1.14 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;

- (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and
 - (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.16 General Provisions Relating to NESHAP Subpart KK [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.823, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 1 of 40 CFR Part 63, Subpart KK in accordance with schedule in 40 CFR 63 Subpart KK.

D.1.17 NESHAP Subpart KK Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1]

Pursuant to CFR Part 63, Subpart KK, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart KK, which are incorporated by reference as 326 IAC 20-18-1, as specified below.

§ 63.820 Applicability.

(a) The provisions of this subpart apply to:

(2) Each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of paragraphs (a)(2)(i) and (ii) of this section for purposes of establishing the facility to be an area source of HAP with respect to this subpart. A facility which establishes area source status through some other mechanism, as described in paragraph (a)(7) of this section, is not subject to the provisions of this subpart.

(i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

(3) Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this section shall be considered an area source, and is subject only to the provisions of §63.829(d) and §63.830(b)(1) of this subpart.

(4) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).

(5) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section to become an area source, but subsequently exceeds either of the thresholds in paragraph (a)(2) of this section for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of this subpart as noted in paragraph (a)(1) of this section and would no longer be eligible to use the provisions of paragraph (a)(2) of this section, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in paragraph (a)(2) of this section.

(6) An owner or operator of an affected source subject to paragraph (a)(2) of this section who chooses to no longer be subject to paragraph (a)(2) of this section shall notify the Administrator of such change. If, by no longer being subject to paragraph (a)(2) of this section, the facility at which the affected source is located becomes a major source:

(i) The owner or operator of an existing source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for existing affected sources under this subpart;

(ii) The owner or operator of a new source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for new affected sources under this subpart.

(7) Nothing in this paragraph is intended to preclude a facility from establishing area source status by limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(b) This subpart does not apply to research or laboratory equipment.

§ 63.821 Designation of affected sources.

(a) The affected sources subject to this subpart are:

(2) All of the product and packaging rotogravure or wide-web flexographic printing presses at a facility plus any other equipment at that facility which the owner or operator chooses to include in accordance with paragraphs (a)(3) or (a)(4) of this section, except

§ 63.822 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A of this part.

Always-controlled work station means a work station associated with a dryer from which the exhaust is delivered to a control device, with no provision for the dryer exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Capture efficiency means the fraction of all organic HAP emissions generated by a process that are delivered to a control device, expressed as a percentage.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions into a closed-vent system that exhausts to a control device.

Car-seal means a seal that is placed on a device that is used to change the position of a valve or damper (e.g., from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

Certified product data sheet (CPDS) means documentation furnished by suppliers of inks, coatings, varnishes, adhesives, primers, solvents, and other materials or by an independent third party that provides the organic HAP weight fraction of these materials determined in accordance with §63.827(b), or the volatile matter weight fraction or solids weight fraction determined in accordance with §63.827(c). A material safety data sheet (MSDS) may serve as a CPDS provided the MSDS meets the data requirements of §63.827(b) and (c). The purpose of the CPDS is to assist the owner or operator in demonstrating compliance with the emission limitations presented in §§63.824–63.825.

Coating means material applied onto or impregnated into a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, solvent-borne coatings, waterborne coatings, wax coatings, wax laminations, extrusion coatings, extrusion laminations, 100 percent solid adhesives, ultra-violet cured coatings, electron beam cured coatings, hot melt coatings, and cold seal coatings. Materials used to form unsupported substrates such as calendaring of vinyl, blown film, cast film, extruded film, and coextruded film are not considered coatings.

Control device means a device such as a carbon adsorber or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

Control device efficiency means the ratio of organic HAP emissions recovered or destroyed by a control device to the total organic HAP emissions that are introduced into the control device, expressed as a percentage.

Day means a 24-consecutive-hour period.

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

Flexible packaging means any package or part of a package the shape of which can be readily changed. Flexible packaging includes, but is not limited to, bags, pouches, labels, liners and wraps utilizing paper, plastic, film, aluminum foil, metalized or coated paper or film, or any combination of these materials.

Flexographic press means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work stations, one or more of which is a flexographic print station, any dryers (including interstage dryers and overhead tunnel dryers) associated with the work stations, and a rewind, stack, or collection section. The work stations may be oriented vertically, horizontally, or around the circumference of a single large impression cylinder. Inboard and outboard work stations, including those employing any other technology, such as rotogravure, are included if they are capable of printing or coating on the same substrate. A publication rotogravure press with one or more flexographic imprinters is not a flexographic press.

Flexographic print station means a print station on which a flexographic printing operation is conducted. A flexographic print station includes an anilox roller that transfers material to a raised image (type or art) on a plate cylinder. The material is then transferred from the image on the plate cylinder to the web or sheet to be printed. A flexographic print station may include a fountain roller to transfer material from the reservoir to the anilox roller, or material may be transferred directly from the reservoir to the anilox roller. The materials applied are of a fluid, rather than paste, consistency.

HAP applied means the organic HAP content of all inks, coatings, varnishes, adhesives, primers, solvent, and other materials applied to a substrate by a product and packaging rotogravure or wide-web flexographic printing affected source.

HAP used means the organic HAP applied by a publication rotogravure printing affected source, including all organic HAP used for cleaning, parts washing, proof presses, and all organic HAP emitted during tank loading, ink mixing, and storage.

Intermittently-controllable work station means a work station associated with a dryer with provisions for the dryer exhaust to be delivered to or diverted from a control device depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Month means a calendar month or a prespecified period of 28 days to 35 days.

Narrow-web flexographic press means a flexographic press that is not capable of printing substrates greater than 18 inches in width and that does not also meet the definition of rotogravure press (i.e., it has no rotogravure print stations).

Never-controlled work station means a work station which is not equipped with provisions by which any emissions, including those in the exhaust from any associated dryer, may be delivered to a control device.

Other press means a lithographic press, letterpress press, or screen printing press that does not meet the definition of rotogravure press or flexographic press (i.e., it has no rotogravure print stations and no flexographic print stations), and that does not print on fabric or other textiles as defined in the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP (40 CFR part 63, subpart OOOO), wood furniture components as defined in the Wood Furniture Manufacturing Operations NESHAP (40 CFR part 63, subpart JJ) or wood building products as defined in the Surface Coating of Wood Building Products NESHAP (40 CFR part 63, subpart QQQQ).

Overall Organic HAP control efficiency means the total efficiency of a control system, determined either by:

- (1) The product of the capture efficiency and the control device efficiency or
- (2) A liquid-liquid material balance.

Print station means a work station on which a printing operation is conducted.

Printing operation means the formation of words, designs, or pictures on a substrate other than wood furniture components as defined in the Wood Furniture Manufacturing Operations NESHAP (40 CFR part 63, subpart JJ), wood building products as defined in the Surface Coating of Wood Building Products NESHAP (40 CFR part 63, subpart QQQQ), and fabric or other textiles as defined in the Printing, Coating, and Dyeing of Fabric and Other Textiles NESHAP (40 CFR part 63, subpart OOOO), except for fabric or other textiles for use in flexible packaging.

Product and packaging rotogravure printing means the production, on a rotogravure press, of any printed substrate not otherwise defined as publication rotogravure printing. This includes, but is not limited to, folding cartons, flexible packaging, labels and wrappers, gift wraps, wall and floor coverings, upholstery, decorative laminates, and tissue products.

Proof press means any press which prints only non-saleable items used to check the quality of image formation of rotogravure cylinders or flexographic plates; substrates such as paper, plastic film, metal foil, or vinyl; or ink, coating varnish, adhesive, primer, or other solids-containing material.

Publication rotogravure press means a rotogravure press used for publication rotogravure printing. A publication rotogravure press may include one or more flexographic imprinters. A publication rotogravure press with one or more flexographic imprinters is not a flexographic press.

Publication rotogravure printing means the production, on a rotogravure press, of the following saleable paper products:

- (1) Catalogues, including mail order and premium,
- (2) Direct mail advertisements, including circulars, letters, pamphlets, cards, and printed envelopes,
- (3) Display advertisements, including general posters, outdoor advertisements, car cards, window posters; counter and floor displays; point of purchase and other printed display material,
- (4) Magazines,
- (5) Miscellaneous advertisements, including brochures, pamphlets, catalog sheets, circular folders, announcements, package inserts, book jackets, market circulars, magazine inserts, and shopping news,
- (6) Newspapers, magazine and comic supplements for newspapers, and preprinted newspaper inserts, including hi-fi and spectacolor rolls and sections,
- (7) Periodicals, and
- (8) Telephone and other directories, including business reference services.

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Rotogravure press means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work stations, one or more of which is a rotogravure print station, any dryers associated with the work stations, and a rewind, stack, or collection section. Inboard and outboard work stations, including those employing any other technology, such as flexography, are included if they are capable of printing or coating on the same substrate.

Rotogravure print station means a print station on which a rotogravure printing operation is conducted. A rotogravure print station includes a rotogravure cylinder and supply for ink or other solids containing material. The image (type and art) to be printed is etched or engraved below the surface of the rotogravure cylinder. On a rotogravure cylinder the printing image consists of millions of minute cells.

Stand-alone equipment means an unwind or feed section, which may include more than one unwind or feed station (such as on a laminator); a series of one or more work stations and any associated dryers; and a rewind, stack, or collection section that is not part of a product and packaging rotogravure or wide-web flexographic press. Stand-alone equipment is sometimes referred to as "off-line" equipment.

Wide-web flexographic press means a flexographic press capable of printing substrates greater than 18 inches in width.

Work station means a unit on which material is deposited onto a substrate.

(b) The symbols used in equations in this subpart are defined as follows:

(1) C_{ahi} =the monthly average, as-applied, organic HAP content of solids-containing material, i , expressed as a weight-fraction, kg/kg.

(2) C_{asi} =the monthly average, as applied, solids content, of solids-containing material, i , expressed as a weight-fraction, kg/kg.

(3) C_{hi} =the organic HAP content of ink or other solids-containing material, i , expressed as a weight-fraction, kg/kg.

(4) C_{hij} =the organic HAP content of solvent j , added to solids-containing material i , expressed as a weight-fraction, kg/kg.

(5) C_{hj} =the organic HAP content of solvent j , expressed as a weight-fraction, kg/kg.

(6) [Reserved]

(7) C_{si} =the solids content of ink or other material, i , expressed as a weight-fraction, kg/kg.

(8) C_{vi} =the volatile matter content of ink or other material, i , expressed as a weight-fraction, kg/kg.

(9) E =the organic volatile matter control efficiency of the control device, percent.

(10) F =the organic volatile matter capture efficiency of the capture system, percent.

(11) G_i =the mass fraction of each solids containing material, i , which was applied at 20 weight-percent or greater solids content, on an as-applied basis, kg/kg.

(12) H = the monthly organic HAP emitted, kg.

- (13) H_a =the monthly allowable organic HAP emissions, kg.
- (14) H_L =the monthly average, as-applied, organic HAP content of all solids-containing materials applied at less than 0.04 kg organic HAP per kg of material applied, kg/kg.
- (15) H_s =the monthly average, as-applied, organic HAP to solids ratio, kg organic HAP/kg solids applied.
- (16) H_{si} =the as-applied, organic HAP to solids ratio of material i.
- (17) L =the mass organic HAP emission rate per mass of solids applied, kg/kg.
- (18) M_{Bi} =the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in bypass mode and the mass of solids-containing material, i, applied on never-controlled work stations, in a month, kg.
- (19) M_{Bj} =the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in bypass mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on never-controlled work stations, in a month, kg.
- (20) M_{ci} =the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing material, i, applied on always-controlled work stations, in a month, kg.
- (21) M_{cj} =the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on always-controlled work stations in a month, kg.
- (22) [Reserved]
- (23) M_{fi} =the organic volatile matter mass flow rate at the inlet to the control device, kg/h.
- (24) M_{fo} =the organic volatile matter mass flow rate at the outlet of the control device, kg/h.
- (25) M_{hu} =the mass of organic HAP used in a month, kg.
- (26) M_i =the mass of ink or other material, i, applied in a month, kg.
- (27) M_{ij} =the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing material, i, in a month, kg.
- (28) M_j =the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied in a month, kg.
- (29) M_{lj} =the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, in a month, kg.
- (30) M_{vr} =the mass of volatile matter recovered in a month, kg.
- (31) M_{vu} =the mass of volatile matter, including water, used in a month, kg.

(32) [Reserved]

(33) n =the number of organic compounds in the vent gas.

(34) p =the number of different inks, coatings, varnishes, adhesives, primers, and other materials applied in a month.

(35) q =the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month.

(36) [Reserved]

(37) R =the overall organic HAP control efficiency, percent.

(38) R_e =the overall effective organic HAP control efficiency for publication rotogravure, percent.

(39) R_v =the organic volatile matter collection and recovery efficiency, percent.

(40) S =the mass organic HAP emission rate per mass of material applied, kg/kg.

(41) 0.0416=conversion factor for molar volume, kg-mol/m³ (@ 293 K and 760 mmHg).

[61 FR 27140, May 30, 1996, as amended at 71 FR 29800, May 24, 2006]

§ 63.829 *Recordkeeping requirements.*

(d) The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

§ 63.830 *Reporting requirements.*

(b) Each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:

(1) An initial notification required in §63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in §63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by §63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ProEdge, Inc.
Source Address: 23326 Shelby Road, Shelby, Indiana 46377
Mailing Address: P.O. Box 201, Shelby, IN 46377
FESOP Permit No.: F089-21286-00447

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ProEdge, Inc.
Source Address: 23326 Shelby Road, Shelby, Indiana 46377
Mailing Address: P.O. Box 201, Shelby, IN 46377
FESOP Permit No.: F089-21286-00447

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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

FESOP Quarterly Report

Source Name: ProEdge, Inc.
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: P.O. Box 201, Shelby, IN 46377
 FESOP Permit No.: F089-21286-00447
 Facility: Printing press, Cerutti #001
 Parameter: VOC input
 Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press, Cerutti #001, when applying solvent based materials, shall be limited to less than 800 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ProEdge, Inc.
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: P.O. Box 201, Shelby, IN 46377
 FESOP Permit No.: F089-21286-00447
 Facility: Printing press, Cerutti #001
 Parameter: Single HAP input
 Limit: The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 247.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ProEdge, Inc.
 Source Address: 23326 Shelby Road, Shelby, Indiana 46377
 Mailing Address: P.O. Box 201, Shelby, IN 46377
 FESOP Permit No.: F089-21286-00447
 Facility: Printing press, Cerutti #001
 Parameter: Combined HAP input
 Limit: The total input of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 618.75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ProEdge, Inc.
Source Address: 23326 Shelby Road, Shelby, Indiana 46377
Mailing Address: P.O. Box 201, Shelby, IN 46377
FESOP Permit No.: F089-21286-00447

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

Page 1 of 2

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	ProEdge, Inc.
Source Location:	23326 Shelby Road, Shelby, Indiana 46377
County:	Lake
SIC Code:	2754
Permit Renewal No.:	F089-21286-00447
Permit Reviewer:	Julia Handley/EVP

On July 26, 2007, the Office of Air Quality (OAQ) had a notice published in the Post Tribune, Merrillville, Indiana, stating that ProEdge, Inc. had applied for the renewal of a Federally Enforceable State Operating Permit (FESOP) to continue to operate a stationary rotogravure printing operation. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On August 2, 2007, Adelbert Bells of ProEdge, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in **bold**, deletions in ~~strikeout~~):

Comment 1:

There is no current requirement to test the catalyst as part of the stack test. The language Condition D.1.5(b) requires testing every 24 months while stack testing is required every 30 months. There is no data justifying more frequent stack testing and for that matter, there is no data suggesting a requirement for catalyst activity testing. Our last stack test (September, 2005) resulted in 99.8% destruction efficiency, nearly identical to our start-up test. Our latest catalyst test showed a range of activity from 97.5% to 98.8% with 98.8% being a control sample of virgin catalyst. No significant contamination of our catalyst was detected.

The only reason to test the catalyst is to detect significant deterioration of catalyst activity. Our testing shows virtually no reduction in destruction efficiency over a three year period, virtually no catalyst contamination over a three year period and virtually no reduction in catalyst activity over a three year period.

There is an experimental error associated with catalyst testing. At 600 degrees, our latest catalyst test (May 2005) produced a range of activity levels from 97.5% to 98.8% with 98.8%. The opinion of Debbie Devroy, a catalyst expert at MegTac (the catalyst manufacturer), is that there is no significant difference between the 98.8% sample and the 97.5% sample. In other words, test to test variation can explain the difference from the 98.8% sample to the 97.5% sample. If the language Ramesh Tejuja, IDEM Air Inspector, is suggesting was in place in May of 2005, we would have been required to spend \$20,000 on a stack test or replace over \$100,000 worth of catalyst. Neither action could possibly improve upon our actual destruction efficiency of 99.8%.

We request that the catalyst testing frequency be changed to every 30 months to coincide with the VOC stack testing.

Response 1:

IDEM, OAQ agrees and has clarified the catalyst testing requirement and revised the catalyst testing frequency from every 24 months to every 30 months. Condition D.1.5(b) has been revised as follows:

D.1.5 Testing Requirements [326 IAC 8-1-12]

- (b) ~~Within eighteen (18) months of issuance of this permit and at least every twenty-four (24) months thereafter,~~ **In conjunction with the compliance test required by D.1.5(a)(1) and at least every thirty (30) months thereafter,** the permittee shall remove the primary catalyst from each oven and have the catalyst vendor conduct a catalyst activity analysis. Catalysts with percent activity less than the catalyst activity ~~of the oldest catalyst~~ **measured during the compliance test** must be replaced or a stack test must be conducted to show that 96.0% overall efficiency is being achieved.

Comment 2:

The application date is 2005, not 2004 as shown on page 14 of the Technical Support Document.

Response 2:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

It is noted here that an application for the purposes of this review was received on June 10, 2005.

Upon further review IDEM, OAQ has made the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~):

Revision 1:

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, Condition D.1.2 has been revised to limit source-wide VOC emissions from 32.5 tons per year to less than 25 tons per year as follows:

D.1.2 Volatile Organic Chemicals [326 IAC 2-8] [326 IAC 2-3]

The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press, Cerutti #001, when applying solvent based materials, shall be limited to less than ~~800~~ **600.00** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96.0%. The usage limitation in combination with control device is necessary to limit VOC emissions from the printing press, Cerutti #001, to less than ~~32.00~~ **24.00** tons per twelve (12) consecutive month period. Compliance with these limits will satisfy 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-2 (PSD) not applicable.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	ProEdge, Inc.
Source Location:	23326 Shelby Road, Shelby, Indiana 46377
County:	Lake
SIC Code:	2754
Permit Renewal No.:	F089-21286-00447
Permit Reviewer:	Julia Handley/EVP

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ProEdge, Inc. relating to the operation of a stationary rotogravure printing operation.

History

On June 10, 2005, ProEdge, Inc. submitted an application to the OAQ requesting to renew its operating permit. ProEdge, Inc. was issued a FESOP on March 14, 2001.

Permitted Emission Units and Pollution Control Equipment

- (a) one (1) seven station packaging rotogravure printing press identified as Cerutti # 001, constructed in 2002, with a maximum line speed of 620 feet per minute (ft/min), one (1) natural gas fired press dryer oven system, constructed in 2002, with combined heat input rate of 8.65 million (MM) British thermal units (Btu) per hour, with volatile organic compounds (VOC) controlled by a system consisting of a permanent total enclosure vented to catalytic oxidizer, constructed in 2002, with a heat input capacity of 8.0 million (MM) British thermal units (Btu) per hour, and exhausting through one (1) stack identified as 001.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) Six (6) natural gas-fired space heaters with a combined heat input rate of 1.09 MMBtu per hour;
- (b) Application of oils, greases, lubricants or other non volatile materials applied as temporary protective coatings;
- (c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (d) Cleaners and solvents characterized as follows:

- (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
- (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on site sewage treatment facility;
- (g) Paved and unpaved roads and parking lots with public access;
- (h) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
- (i) Combustion source flame safety purging on startup;
- (j) Closed loop heating and cooling systems;
- (k) Blowdown for any of the following:
 - (1) boiler;
 - (2) sight glass;
 - (3) compressors;
 - (4) pumps; and
 - (5) cooling tower;
- (l) 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;
- (m) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons;
- (n) Mixers operating on open or closed, vented containers with a capacity of less than 200 gallons; and
- (o) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

Since the issuance of FESOP No. 089-12875-00447 on March 10, 2001, no additional approvals have been issued to the source.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
001	Press: Cerutti # 001	30	3.23	17,330	388

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	maintenance
PM _{2.5}	nonattainment
SO ₂	maintenance
NOx	attainment
8-hour Ozone	nonattainment
CO	maintenance
Lead	attainment

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100
CO	less than 100
NO _x	less than 100

HAPs	tons/year
Toluene	greater than 10
MIBK	greater than 10
Hexane	less than 10
Total	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOCs is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Combined HAPs
Rotogravure Printing Press Cerutti 001	-	-	-	32.00 ⁽¹⁾	-	-	9.90	24.75
Natural Gas Combustion	0.15	0.59	0.05	0.43	6.53	7.77	0.14	0.15
Total Emissions	0.15	0.59	0.05	32.43	6.53	7.77	<10	<25

(1) The source has requested to limit VOC emissions from the rotogravure printing press cerutti 001 to less than 32 tons per year, to render the requirements of 326 IAC 2-7 and 2-2 not applicable.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The rotogravure printing press identified as Cerutti # 001 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.430 through 40 CFR 60.435, Subpart QQ), because it does not meet the definition of a publication printing press to which Subpart QQ applies. Therefore, the requirements of this rule are not included in the permit.
- (c) The rotogravure printing press identified as Cerutti # 001 is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (40 CFR 63.3280, Subpart JJJJ), because this source is limiting HAP emissions to less than 10 tons per year of any single HAP and less than 25 tons per year of combined HAPs . Since this printing press is not a major source of HAPs, it is not subject to the requirements of NESHAP, Subpart JJJJ. Therefore, the requirements of this rule have not been included in the permit.
- (d) The packaging rotogravure printing press identified as Cerutti # 001 is subject to the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR 63.820, Subpart KK), which is incorporated by reference as 326 IAC 20-18 because the potential emissions of any combination of HAPs and a single HAP are each greater than 25 and 10 tons per year, respectively. However, the permittee has chosen to limit source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Pursuant to 40 CFR 63.820(a)(3), each source for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 63.830(b)(1).

Non applicable portions of the NESHAP will not be included in the permit. The rotogravure printing press identified as Cerutti # 001 is subject to the following portions of Subpart KK.

- (1) 40 CFR 63.820(a)(2)
- (2) 40 CFR 63.820(a)(3)
- (3) 40 CFR 63.820(a)(4)
- (4) 40 CFR 63.820(a)(5)
- (5) 40 CFR 63.820(a)(6)
- (6) 40 CFR 63.820(a)(7)
- (7) 40 CFR 63.820(b)
- (8) 40 CFR 63.821(a)(2)
- (9) 40 CFR 63.822
- (10) 40 CFR 63.829(d)
- (11) 40 CFR 63.830(b)(1)

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart KK.

- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. These requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets the following criteria:

- (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
- (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
- (3) The unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source is not one of the twenty-eight (28) listed source categories, was constructed in 2002, after the applicability date of August 1977, and is located in Lake County. The potential to emit of all criteria pollutants, except VOCs, is less than 250 tons per year. VOC emissions are limited to less than 100 tons per year after application of all federally enforceable emission limits, in accordance with 326 IAC 2-8 (FESOP) and to render 326 IAC 2-3 (Emission Offset) not applicable. Therefore, the source is not a major source pursuant to 326 IAC 2-2 (PSD) and the requirements of this rule have not been included in the permit.

326 IAC 2-3 (Emission Offset)

The source is located in Lake County, which is a moderate nonattainment area for the 8-hour ozone standard. Source wide VOC emissions will be limited to less than 100 tons per twelve (12) consecutive month period, in accordance with 326 IAC 2-8. Therefore, pursuant to 326 IAC 2-3 the source is not subject to the requirements of 326 IAC 2-3 (Emission Offset) and the requirements of this rule are not included in the permit.

326 IAC 2-1.1-5 (Nonattainment NSR)

According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tons per year of PM10. ProEdge, Inc. has potential uncontrolled emissions of PM10 less than 100 tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

326 IAC 2-8 (FESOP)

This source will limit its potential to emit VOC to less than 100 tons VOC per year. Therefore the potential to emit of all criteria pollutants is below major source thresholds and the requirements of 326 IAC 2-7 do not apply.

- (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to the printing press, Cerutti #001, when applying solvent based materials, shall be limited to 800 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the printing press, Cerutti #001, shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%. This will limit the potential to emit VOC from the printing press, Cerutti #001, to 32.0 tons per twelve (12) consecutive month period and the source wide potential to emit (PTE) to less than 100 TPY.
- (b) The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 247.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%. This will limit the potential to emit any single HAP from the entire source, Cerutti #001, to 9.90 tons per twelve (12) consecutive month period.
- (c) The total input of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the entire source including printing press, Cerutti #001, shall be limited to less than 618.75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. HAP emissions from each press shall be controlled by a capture and oxidation system that achieves a minimum overall control efficiency of 96%. This will limit the potential to emit any combination of HAPs from the entire source, Cerutti #001, to 24.9 tons per twelve (12) consecutive month period.

Compliance with the above limits will satisfy 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70), 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is subject to this rule because it is located in Lake county and it has the potential to emit VOC into the ambient air at levels equal to or greater than 25 tons per year. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2(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 the permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a) this source is not subject to the requirements of 326 IAC 6.8 because it is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11 and it does not have the potential to emit one hundred (100) tons of more or actual emission greater than ten (10) tons or more of particulate matter per year. Therefore, the requirements of this rule are not included in the permit for this source.

State Rule Applicability – Individual Facilities

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

The operation of printing press, Cerutti #001, has the potential to emit greater than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. However, compliance with the requirements of 326 IAC 2-8 will limit potential emissions to less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, facilities not regulated by other rules in Article 8, with potential VOC emissions equal to or greater than 25 tons per year, shall utilize Best Available Control Technology. The rotogravure printing press, Cerutti #001, is subject to 326 IAC 8-5-5 (Graphic Arts Operations), therefore, it is not subject to this rule.

326 IAC 8-7 (Specific VOC Reductions for Lake, Porter, Clark and Floyd Counties)

Pursuant to 326 IAC 8-7-2(1)(3), this source is not subject to the requirements of this rule because they are subject to the requirements of 326 IAC 8-5-5. Therefore, the requirements of this rule are not included in the permit.

326 IAC 8-5-5 (Graphic Arts Operations)

Pursuant to 326 IAC 8-5-5(b)(a), the rotogravure printing Press, Cerutti #001, is a "packaging rotogravure" press. Therefore, since this packaging rotogravure printing press is subject to 326 IAC 8-5-5 because it is located in Lake County, and has potential VOC emissions greater than 25 tons per year. Pursuant to this rule, no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five (25) percent by volume or less of VOC, and seventy-five (75) percent by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains sixty (60) percent by volume or more of nonvolatile material; or
- (c) the owner or operator installs and operates a control device (ie; catalytic oxidizer system) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustion carbon) to carbon dioxide and water; or
- (d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.

Pursuant to 326 IAC 8-5-5(d)(3), a capture system must be used in conjunction with the emission control systems. The capture system shall attain efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

The source shall be able to comply with the rule by utilizing a VOC capture and control system with an overall VOC control efficiency of 95% at printing press, Cerutti #001.

326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices)

- (a) Pursuant to 326 IAC 8-1-12(a), this rule applies to any source that uses a control device to comply with a VOC emission limit, and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3) for Graphics Arts Operations. This source meets the applicability criteria of 326 IAC 8-5-5(a)(2) and 326 IAC 8-5-5(a)(3). The source also proposes to use control devices to meet the requirements of 326 IAC 8-5-5 when applying solvent based materials, therefore, the requirements of 326 IAC 8-1-12 apply to this source when operating the VOC control device.
- (b) Pursuant to 326 IAC 8-1-12(b), upon startup of a new coating facility, the owner or operator of the coating facility shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.

- (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
 - (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (a) startup of a new coating facility
 - (b) changing the method of compliance
 - (c) receipt of a written request from the department or U.S. EPA.
 - (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test.
- (2) Monitoring equipment requirements shall be as follows:
- (A) If a catalytic oxidizer is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the oxidizer shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
- (c) Pursuant to 326 IAC 8-1-12(c), on and after startup of a new coating facility, the owner or operator of a coating facility identified in subsection (a) shall collect and record each day and maintain all of the following information each day for each coating facility:
- (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit of volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit of volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit of volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.

- (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C) of this rule.
 - (6) Control device monitoring data as follows:
 - (A) For catalytic oxidizers, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the oxidizer.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including the dates and duration of any outages.
- (d) Pursuant to 326 IAC 8-1-12(d), upon startup of a new coating facility, the owner or operator of a coating facility shall notify the department in either of the following instances:
- (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (C) Time, date, and duration of the noncompliance.
 - (D) Corrective action taken.

- (2) At least thirty (30) calendar days before changing the method of compliance from the use of control device to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of section 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance for a coating facility from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The catalytic oxidizer associated with the printing press, Cerutti #001, has applicable compliance determination conditions as specified below:
 1. Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each oxidation control system shall be tested according to the following schedule and in the following situations:
 - A. No later than thirty (30) months from September 7, 2005, compliance tests shall be conducted. This test shall be repeated at least once every thirty (30) months from the date of this valid compliance demonstration.
 - B. A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - C. A compliance test shall be performed within ninety (90) days of:
 - (i) Startup of a new coating facility;
 - (ii) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (iii) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

- D. All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
- (i) Test procedures;
 - (ii) Operating and control system parameters;
 - (iii) Type of VOC containing process material being used; and
 - (iv) The process and control system parameters that will be monitored during the test.
2. Within eighteen (18) months of issuance of this permit and at least every twenty-four (24) months thereafter, the permittee shall remove the primary catalyst from each oven and have the catalyst vendor conduct a catalyst activity analysis. Catalysts with percent activity less than the catalyst activity of the oldest catalyst must be replaced or a stack test must be conducted to show that 96.0% overall efficiency is being achieved.
 3. Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the catalytic oxidizer to achieve compliance with VOC emission limitations.
 4. Compliance with the VOC content and usage limitations contained shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
 5. The catalytic oxidizer controlling VOC and HAP emissions from the printing press shall be in operation at all times that these units are in operation.
- (b) The catalytic oxidizer associated with the rotogravure printing Press, Cerutti #001, has applicable compliance monitoring requirements applicable to this source are as follows:
1. A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer control device associate with rotogravure printing press, Cerutti # 1, for measuring operating temperature. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of catalytic incinerators are below 625°F. A 3-hour average temperature that is below 625°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.
 2. The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits pursuant to 326 IAC 8-1-12, as approved by IDEM.

3. On and after the date the approved stack 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 of the catalytic incinerators are below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
4. Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

When a catalytic oxidizer is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each oxidizer shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

These monitoring conditions are necessary because the permanent total enclosure vented to catalytic oxidizer for the rotogravure printing Press, Cerutti #001, must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations) and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 10, 2004.

Conclusion

The operation of this rotogravure printing plant shall be subject to the conditions of the attached FESOP Renewal No. 089-21286-00447.

**Appendix A: Emission Calculations
Summary**

Company Name: ProEdge, Inc.
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
Permit Number: F089-21286-00447
Permit Reviewer: Julia Handley/EVP

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Rotogravure Printing Press Cerutti 001	Natural Gas Combustion	TOTAL
PM	0.00	0.15	0.15
PM10	0.00	0.59	0.59
SO2	0.00	0.05	0.05
NOx	0.00	7.77	7.77
VOC	4,662.53	0.43	4,662.96
CO	1.00	6.53	7.53
total HAPs	2,207.91	0.15	2,208.06
worst case single HAP	1,923.65	0.14	1,923.65

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Rotogravure Printing Press Cerutti 001	Natural Gas Combustion	TOTAL
PM	0.00	0.15	0.15
PM10	0.00	0.59	0.59
SO2	0.00	0.05	0.05
NOx	0.00	7.77	7.77
VOC	32.00	0.43	32.43
CO	0.00	6.53	6.53
total HAPs	24.75	0.15	24.90
worst case single HAP	9.90	0.14	9.90

Total emissions based on rated capacity at 8,760 hours/year, after control and federally enforceable limitations.

**Appendix A: Emission Calculations
VOC Emission Calculations**

Company Name: ProEdge, Inc.
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
Permit Number: F089-21286-00447
Permit Reviewer: Julia Handley/EVP

Throughput for Packaging Rotogravure Printing Press:							
Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 Min/ Hour	8,760 HR YEAR	1/1,000,000	Potential MMin ² /Year
Cerutti 001	620	12	31.0	60	8,760	1,000,000	121,224
Potential Uncontrolled VOC Emissions:							
Ink Name	Maximum Coverage lbs/ MMin ²	Weight % Organics	Flash Off %	Potential Throughput MMin ² /Year	Tons/ 2,000 lbs	Potential VOC Pounds per Hour	Potential VOC Tons per Year
Base Intermediate (18730)	11.4	75.00%	100%	121,224	2,000	118.32	518.23
Light Maple (17502)	42.7	56.00%	100%	121,224	2,000	330.90	1449.36
White (14777)	45.5	55.00%	100%	121,224	2,000	346.31	1516.82
Dark Oak (15931)	34.1	57.00%	100%	121,224	2,000	268.98	1178.12
Total Potential Uncontrolled Emissions:						1,064.51	4,662.53
Limited / Controlled VOC Emissions:							
Ink Name	Control Equipment ID	Capture Efficiency	Destruction Efficiency	Controlled VOC Pounds per Hour	Controlled VOC Tons per Year		
Base Intermediate (18730)	catalytic oxidizer	100.00%	96.00%	4.73	20.73		
Light Maple (17502)	catalytic oxidizer	100.00%	96.00%	13.24	57.97		
White (14777)	catalytic oxidizer	100.00%	96.00%	13.85	60.67		
Dark Oak (15931)	catalytic oxidizer	100.00%	96.00%	10.76	47.12		
Total Controlled Emissions:				42.58	186.50		
Total Limited Emissions:				7.31	32.00		
Maximum allowable annual VOC input				182.65	800.00		

Note:

All of the coatings within one category (adhesive, ink, or varnish) are mutually exclusive with the other coatings within that category (adhesive, ink or varnish).

Press Cerutti 001 has a maximum line speed of 620 ft/min (printing only)

Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%

Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year

Potential Uncontrolled VOC Emissions = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year

Controlled Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency))

Maximum allowable VOC input = total limited emissions / (1 - (Capture Efficiency * Destruction Efficiency))

Appendix A: Emission Calculations

HAP Emission Calculations

Company Name: ProEdge, Inc.
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
Permit Number: F089-21286-00447
Permit Reviewer: Julia Handley/EVP

Potential HAP Emissions								
Material	Maximum Coverage lbs/ MMin ²	Weight % Organics	Potential MMin ² /Year	Weight % Toluene	Weight % MIBK	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Press ID: Cerutti 001								
Base Intermediate (18730)	11.4	75.00%	121,224	6.80%	37.10%	35.24	192.26	227.50
Light Maple (17502)	42.7	56.00%	121,224	46.00%	2.20%	666.71	31.89	698.59
White (14777)	45.5	55.00%	121,224	48.00%	1.40%	728.07	21.24	749.31
Dark Oak (15931)	34.1	57.00%	121,224	41.90%	3.30%	493.63	38.88	532.51
Total Potential Uncontrolled Emissions:						1923.65	284.26	2207.91
Limited / Controlled HAP Emissions:								
Ink Name	Control Equipment ID	Capture Efficiency	Destruction Efficiency	Controlled Toluene Tons per Year	Controlled MIBK Tons per Year	Controlled Total HAP Tons per Year		
Base Intermediate (18730)	catalyticoxidizer	100.00%	96.00%	1.41	7.69	9.10		
Light Maple (17502)	catalyticoxidizer	100.00%	96.00%	26.67	1.28	27.94		
White (14777)	catalyticoxidizer	100.00%	96.00%	29.12	0.85	29.97		
Dark Oak (15931)	catalyticoxidizer	100.00%	96.00%	19.75	1.56	21.30		
Total Controlled Emissions:				76.95	11.37	align="right"> 88.32		
Total Limited Emissions:				9.90	9.90	align="right"> 24.75		
Maximum allowable annual HAP input				247.50	247.50	align="right"> 618.75		

METHODOLOGY

HAPs emission rate = Maximum Coverage pounds per MMin² * Wight percent volatile * Weight percentage HAPs * Potential MMin²/year * (1 ton/2,000 lbs) = Tons per Year

Controlled Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency))

Maximum allowable HAP inpu t= total limited emissions / (1 - (Capture Efficiency * Destruction Efficiency))

Note:

Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%

ProEdge will limit press VOC usage to 320 TPY

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Boilers**

Company Name: ProEdge, Inc.
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
Permit Number: F089-21286-00447
Reviewer: Julia Handley/EVP

Heat Input Capacity
MMBtu/hr

17.740

Potential Throughput
MMCF/yr

155.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.15	0.59	0.05	7.77	0.43	6.53

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Heat Input Capacity includes:

One (1) 8.65 MMBtu/hr press dryer system (ID No. 01); one (1) 8.0 MMBtu/hr supplementary natural gas fired catalytic oxidizer;
Six (6) natural gas fired space heaters with combined heat input of 1.09 MMBtu/hr.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Boilers
 HAPs Emissions**

Company Name: ProEdge, Inc.
Address City IN Zip: 23326 Shelby Road, Shelby, Indiana 46377
Permit Number: F089-21286-00447
Reviewer: Julia Handley/EVP

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.632E-04	9.324E-05	5.828E-03	0.14	2.642E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.885E-05	8.547E-05	1.088E-04	2.953E-05	1.632E-04

Total HAPs 0.15 tons/yr

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.