



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: December 28, 2006
RE: Multi Color Corporation / 143-21426-00007
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Multi-Color Corporation
2281 South U.S. 31,
Scottsburg, Indiana 47170**

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

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

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

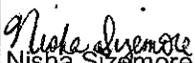
Operation Permit No.: T143-21426-00007	
Issued by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 28, 2006 Expiration Date: December 28, 2011

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary packaging rotogravure printing operation.

Responsible Official:	Mike Cook
Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
General Source Phone Number:	(812)752-8205
SIC Code:	2754
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.

- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source.
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source; and
- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004 [326 IAC 6-2-4].
- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to [326 IAC 20-6] [326 IAC 8-3-2][326 IAC 8-3-5].

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T143-21426-00007, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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 2-7-5(5)]

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

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

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

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

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (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 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) The Permittee shall 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.

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

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation .
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T143-21426-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (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 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

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

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the 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 2-7-5(1)] [326 IAC 2-7-6(1)]

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

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

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

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

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

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

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 63, subpart KK.

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.20 General Reporting Requirements [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

For Printing Stations Using Compliant (i.e., Water-based) Materials

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source; and
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

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

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

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.1.2 PSD Minor Limit [326 IAC 2-2]

The total VOC emission is limited to less than 250 tons per year to be a minor source as follows:

- (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%. The usage limitation in combination with control devices will then be equivalent to a VOC emission limitation of 200.54 tons per year.

The above emission limits including VOC emissions from natural gas combustion, other printing operation scenarios, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year which renders the requirements of 326 IAC 2-2 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.1.2.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

Within one hundred and eighty (180) days after issuance of this Part 70 permit, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per condition D.1.2 for one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, one (1) catalytic oxidizing incinerator, identified as OXD#2 and one (1) catalytic oxidizing incinerator, identified as OXD#5 utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the one (1) thermal oxidizer, identified as OXD#6 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 the thermal oxidizer is below 1500°F. A 3-hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is 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.

D.1.8 Catalytic Incinerator Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic incinerators, identified as OXD#2 and OXD#5 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 600°F. A 3-hour average temperature that is below 600°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - 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.

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

D.1.9 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.19 and 326 IAC 8-1-9(c).

D.1.10 Record keeping Requirements [326 IAC 8-1-10]

- (a) In order to demonstrate compliance with Condition D.1.1, pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility 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 for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.19 and 326 IAC 8-1-9(c).

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.
 - (1) The amount and VOC 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 usage for each month at each press;
 - (5) The weight of VOCs emitted for each compliance period for each press; and
 - (6) The following operation parameters of catalytic incinerators and thermal 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.1.12 Reporting Requirements [326 IAC 8-1-10]

- (a) In order to demonstrate compliance with Condition D.1.1, pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
- (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility 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 certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
- (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.1.2 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.10.

SECTION D.2

FACILITY OPERATION CONDITIONS

For Printing Stations Using Solvent-Based Materials

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source; and
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

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

D.2.1 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 oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance test (described in Condition D.2.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (2) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance test (described in Condition D.2.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The natural gas fired regenerative thermal oxidizer identified as OXD#6 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test (described in Condition D.2.8) 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 thermal and/or 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.2.2 PSD Minor Limit [326 IAC 2-2]

The total VOC emission is limited to less than 250 tons per year to be a minor source as follows:

- (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%. The usage limitation in combination with control devices will then be equivalent to a VOC emission limitation of 200.54 tons per year.

The above emission limits including VOC emissions from natural gas combustion, other printing operation scenarios, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year which renders the requirements of 326 IAC 2-2 not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.2.2.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 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.2.6 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) 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.
- (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:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) 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:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after issuance of this Part 70 permit, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per condition D.2.2 for one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, one (1) catalytic oxidizing incinerator, identified as OXD#2 and one (1) catalytic oxidizing incinerator, identified as OXD#5 utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.8 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the one (1) thermal oxidizer, identified as OXD#6 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 the thermal oxidizer is below 1500°F. A 3-hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is 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.

D.2.9 Catalytic Incinerator Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic incinerators, identified as OXD#2 and OXD#5 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 600°F. A 3-hour average temperature that is below 600°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.2, as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - 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.

D.2.10 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:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator 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; and
- (b) When a catalytic incinerator 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 incinerator 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.

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

D.2.11 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.19 and 326 IAC 8-1-9(c).

D.2.12 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), 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.2.8 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (6) Control device monitoring data as follows:
 - (A) For the thermal incinerator, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was 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.
 - (B) For each catalytic incinerator, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
 - (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 temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and
 - (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 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) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.19 and 326 IAC 8-1-9(c).

D.2.13 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.2.2. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.
 - (1) The amount and VOC 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 usage for each month at each press;
 - (5) The weight of VOCs emitted for each compliance period for each press; and
 - (6) The following operation parameters of catalytic incinerators and thermal 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.2.14 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.2.15 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.2.2 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.10.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).
- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to [326 IAC 20-6], [326 IAC 8-3-2] and [326 IAC 8-3-5].

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

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

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The cold cleaner degreasing operations PW2 and insignificant degreasing operation are subject to this rule. These degreasing operations shall comply with the following requirements.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

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

D.3.3 PSD Minor Limit [326 IAC 2-2]

The total VOC consumption in parts washer PW2 shall be limited to 28.45 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The above emission limits including VOC emissions from natural gas combustion, the printing operations, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year and render the requirements of 326 IAC 2-2 not applicable.

D.3.4 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 its control device.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.3.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.3.
- (1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage in parts washer PW2 for each month;
 - (5) The weight of VOC emitted for each compliance period; and
- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004 [326 IAC 6-2-4].
- (b) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches;

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 6.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations), the Permittee may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine tenths (2.9) pounds per gallon excluding water, delivered to the Offset Gravure Coater station from a label coating line.

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.4.4 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.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.3.
 - (1) The amount and VOC content of each solvent used in the coating applicator of the label coating line. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The weight of VOC emitted for each compliance period; and
- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source; and
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

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

- E.1.1 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.

E.1.2 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:

(1) Each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR Part 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated, and

(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 (a)(2)(ii) of this section for purposes of establishing the facility to be an area source with respect to 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 40 CFR 63.829(d) and 40 CFR 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 Permitting authority 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.

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 paragraph (a)(3) of this section, except
- (i) proof presses, and
 - (ii) any product and packaging rotogravure or wide-web flexographic press which is used primarily for coating, laminating, or other operations which the owner or operator chooses to exclude, provided that
 - (A) The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations, and
 - (B) The owner or operator maintains records as required in 40 CFR 63.829(f).
- (3) The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source stand-alone coating equipment subject to the following provisions:
- (i) Stand-alone coating equipment meeting any of the criteria specified in this subparagraph is eligible for inclusion:
 - (A) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses are used to apply solids-containing materials to the same web or substrate, or
 - (B) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material, or
 - (C) A common control device is used to control organic HAP emissions from the stand-alone coating equipment and from one or more product and packaging rotogravure or wide-web flexographic printing presses;
 - (ii) All eligible stand-alone coating equipment located at the facility is included in the affected source; and
 - (iii) No product and packaging rotogravure or wide-web flexographic presses are excluded from the affected source under the provisions of paragraph (a)(2)(ii) of this section.
- (b) Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR Part 63.2, that complies with the criteria of paragraphs (b)(1) or (b)(2) on and after the applicable compliance date as specified in 40 CFR 63.826 of this subpart is subject only to the requirements of 40 CFR 63.829(e) and 40 CFR 63.830(b)(1) of this subpart.
- (1) The owner or operator of the source applies no more than 500 kg per month, for every month, of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials on product and packaging rotogravure or wide-web flexographic printing presses, or
 - (2) The owner or operator of the source applies no more than 400 kg per month, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.
- (c) Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR Part 63.2, that complies with neither the criterion of paragraph (b)(1) nor (b)(2) of this section in any month after the applicable compliance date as specified in 40 CFR 63.826 of this subpart is, starting with that month, subject to all relevant requirements of this subpart and is no longer eligible to use the provisions of paragraph (b) of this section, even if in subsequent months the affected source does comply with the criteria of paragraphs (b)(1) or (b)(2) of this section.

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 outside laboratory that provides the organic HAP content of these materials, by weight, measured using Method 311 of Appendix A of Part 63 or an equivalent or alternative method (or formulation data as provided in 40 CFR 63.827(b)) and the solids content of these materials, by weight, determined in accordance with 40 CFR 63.827(c). The purpose of the CPDS is to assist the owner or operator in demonstrating compliance with the emission limitations presented in 40 CFR 40 CFR 63.824-63.825.

Coating operation means the application of a uniform layer of material across the entire width of a substrate.

Coating station means a work station on which a coating operation is conducted.

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 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.

Flexographic press means an unwind or feed section, 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 station. 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.

Flexographic print station means a work station on which a flexographic printing operation is conducted. A flexographic print station includes a flexographic printing plate which is an image carrier made of rubber or other elastomeric material. The image (type and art) to be printed is raised above the printing plate.

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.

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.

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, and pictures on a substrate other than fabric through the application of material to that substrate.

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 device used only to check the quality of the image formation of rotogravure cylinders or flexographic plates, which prints only non-saleable items.

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 spectacular 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, a series of one or more 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 work station on which a rotogravure printing operation is conducted. A rotogravure print station includes a rotogravure cylinder and ink supply. 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 coating equipment means an unwind or feed section, a series of one or more coating stations and any associated dryers, and a rewind, stack or collection section that (1) is not part of a product and packaging rotogravure or wide-web flexographic press, and (2) is used to conduct one or more coating operations on a substrate. Stand-alone coating equipment (1) may or may not process substrate that is also processed by a product and packaging rotogravure or wide-web flexographic press, (2) apply solids-containing materials that are also applied by a product and packaging rotogravure or wide-web flexographic press, and (3) utilize a control device that is also utilized by a product and packaging rotogravure or wide-web flexographic press.

Stand-alone coating equipment is sometimes referred to as "off-line" coating 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 a rotogravure or wide-web flexographic press where 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) C_i = the organic volatile matter concentration in ppm, dry basis, of compound i in the vent gas, as determined by Method 25 or Method 25A.
- (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 total monthly organic HAP applied, 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) M_f = the total organic volatile matter mass flow rate, kg/h.
- (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) MW_i = the molecular weight of compound i in the vent gas, kg/kg-mol.
- (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) Q_{sd} = the volumetric flow rate of gases entering or exiting the control device, as determined by Method 2, dscm/h.

(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, $\text{kg}\cdot\text{mol}/\text{m}^3$ (@ 293 K and 760 mmHg).

63.823 Standards: General.

Table 1 provides cross references to the 40 CFR Part 63, subpart A, general provisions, indicating the applicability of the general provisions requirements to subpart KK.

63.825 Standards: Product and packaging rotogravure and wide-web flexographic printing.

(a) Each owner or operator of any product and packaging rotogravure or wide-web flexographic printing affected source that is subject to the requirements of this subpart shall comply with these requirements on and after the compliance dates as specified in 40 CFR 63.826 of this subpart. [40 CFR 63.825(a)]

(b) Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs (b)(1) through (b)(10) of this section:

(1) Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with 40 CFR 63.827(b)(2).

(2) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b)(2)(i)-(ii) of this section. The owner or operator shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:

(i) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2).

(ii) Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3.

$$C_{ahi} = \frac{(C_{hi} M_i + \sum_{j=1}^q C_{hij} M_{ij})}{M_i + \sum_{j=1}^q M_{ij}}$$

Eq 3

(3)(i) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either

- (A) Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or
- (B) Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.
- (ii) The owner or operator may demonstrate compliance in accordance with paragraphs (b)(3)(ii)(A)-(C) of this section.
- (A) Use the procedures of paragraph (b)(2) of this section to determine which materials meet the requirements of paragraph (b)(3)(i)(A) of this section,
- (B) Determine the as-applied solids content following the procedure in 40 CFR 63.827(c)(2) of all materials which do not meet the requirements of paragraph (b)(3)(i)(A) of this section. The owner or operator may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using Equation 4, and

$$C_{asi} = \frac{C_{si} M_i}{M_i + \sum_{j=1}^q M_{ij}}$$

Eq 4

- (C) Calculate the as-applied organic HAP to solids ratio, H_{si} , for all materials which do not meet the requirements of paragraph (b)(3)(i)(A) of this section, using Equation 5.

$$H_{si} = \frac{C_{ahi}}{C_{asi}}$$

Eq 5

- (4) Demonstrate that the monthly average as-applied organic HAP content, H_L , of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6.

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

Eq 6

- (5) Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, H_S , is less than 0.20 kg HAP per kg solids applied as determined by Equation 7.

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

Eq 7

- (6) Demonstrate that the total monthly organic HAP applied, H , as determined by Equation 8, is less than the calculated equivalent allowable organic HAP, H_a , as determined by paragraph (e) of this section.

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

Eq 8

(7) Operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. If the affected source operates more than one capture system or more than one control device, and has only always-controlled work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of either paragraph (f) or (h) of this section. If the affected source operates one or more never-controlled work stations or one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of this section. Otherwise, the owner or operator shall demonstrate compliance in accordance with the procedure in paragraph (c) of this section when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of this section when emissions are controlled by an oxidizer.

(8) Operate a capture system and control device and limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average as-applied basis. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of this section. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of this section when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of this section when emissions are controlled by an oxidizer.

(9) Operate a capture system and control device and limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average as-applied basis. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of this section. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of this section when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of this section when emissions are controlled by an oxidizer.

(10) Operate a capture system and control device and limit the monthly organic HAP emissions to less than the allowable emissions as calculated in accordance with paragraph (e) of this section. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of this section. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of this section when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of this section when emissions are controlled by an oxidizer.

(c) To demonstrate compliance with the overall organic HAP control efficiency requirement in 40 CFR 63.825(b)(7) or the organic HAP emissions limitation requirements in 40 CFR 63.825(b)(8)-(10), each owner or operator using a solvent recovery device to control emissions shall show compliance by following the procedures in either paragraph (c)(1) or (c)(2) of this section:

(1) Perform a liquid-liquid material balance for each and every month as follows:

(i) Measure the mass of each ink, coating, varnish, adhesive, primer, solvent and other material applied on the press or group of presses controlled by a common solvent recovery device during the month.

(ii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(b)(2).

(iii) Determine the volatile matter content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).

(iv) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, determine the solids

content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).

(v) Install, calibrate, maintain, and operate according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be initially certified by the manufacturer to be accurate to within ± 2.0 percent.

(vi) Measure the amount of volatile matter recovered for the month.

(vii) Calculate the volatile matter collection and recovery efficiency, R_v , using Equation 9.

$$R_v = 100 \frac{M_{vr}}{\sum_{i=1}^p M_i C_{vi} + \sum_{j=1}^q M_j}$$

Eq 9

(viii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, calculate the organic HAP emitted during the month, H , using Equation 10.

$$H = [1 - \frac{R_v}{100}] [\sum_{i=1}^p (C_{hi} M_i + \sum_{j=1}^q C_{hij} M_{ij})]$$

Eq 10

(ix) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, calculate the organic HAP emission rate based on solids applied, L , using Equation 11.

$$L = \frac{H}{\sum_{i=1}^p C_{si} M_i}$$

Eq 11

(x) If demonstrating compliance on the basis of organic HAP emission rate based on materials applied, calculate the organic HAP emission rate based on material applied, S , using Equation 12.

$$S = \frac{H}{\sum_{i=1}^p [M_i + \sum_{j=1}^q M_{ij}]}$$

Eq 12

(xi) The affected source is in compliance if

(A) The organic volatile matter collection and recovery efficiency, R_v , is 95 percent or greater, or

(B) The organic HAP emission rate based on solids applied, L , is 0.20 kg organic HAP per kg solids applied or less, or

(C) The organic HAP emission rate based on material applied, S , is 0.04 kg organic HAP per kg material applied or less, or

(D) The organic HAP emitted during the month, H , is less than the calculated allowable organic HAP, H_a , as determined using paragraph (e) of this section.

(2) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency following the procedures in paragraphs (c)(2)(i) through (c)(2)(xi) of this section:

(i) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on materials applied, or emission of less than the calculated allowable organic HAP, measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material applied on the press or group of presses controlled by a

common control device during the month.

(ii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(b)(2).

(iii) Install continuous emission monitors to determine the total organic volatile matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter, and the volumetric flow rate in cubic meters per second, such that the total organic volatile matter mass flow rate in grams per second can be calculated and summed) at both the inlet to and the outlet from the control device, such that the percent control efficiency (E) of the control device can be calculated for each month.

(iv) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).

(v) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with 40 CFR 63.828(a)(5) whenever a product and packaging rotogravure or wide-web flexographic printing press is operated.

(vi) Determine the capture efficiency (F) in accordance with 40 CFR 63.827(e)-(f).

(vii) Calculate the overall organic HAP control efficiency, (R), achieved for each month using Equation 13.

$$R = \frac{EF}{100} \quad \text{Eq 13}$$

(viii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, calculate the organic HAP emitted during the month, H, for each month using Equation 14.

$$H = [1 - (\frac{E}{100} \frac{F}{100})] [\sum_{i=1}^p (C_{hi} M_i) + \sum_{j=1}^q (C_{hij} M_{ij})] \quad \text{Eq 14}$$

(ix) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, calculate the organic HAP emission rate based on solids applied, L, using Equation 15.

$$L = \frac{H}{\sum_{i=1}^p C_{si} M_i} \quad \text{Eq 15}$$

(x) If demonstrating compliance on the basis of organic HAP emission rate based on materials applied, calculate the organic HAP emission rate based on material applied, S, using Equation 16.

$$S = \frac{H}{\sum_{i=1}^p [M_i + \sum_{j=1}^q M_{ij}]} \quad \text{Eq 16}$$

(xi) The affected source is in compliance if the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value

established in accordance with 40 CFR 63.828(a)(5) for each three hour period, and
(A) the organic volatile matter collection and recovery efficiency, R_v , is 95 percent or greater, or
(B) the organic HAP emission rate based on solids applied, L , is 0.20 kg organic HAP per kg solids applied or less, or
(C) the organic HAP emission rate based on material applied, S , is 0.04 kg organic HAP per kg material applied or less, or
(D) the organic HAP emitted during the month, H , is less than the calculated allowable organic HAP, H_a , as determined using paragraph (e) of this section.

(d) To demonstrate compliance with the overall organic HAP control efficiency requirement in 40 CFR 63.825(b)(7) or the overall organic HAP emission rate limitation requirements in 40 CFR 63.825(b)(8)-(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of this section:

(1) demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in paragraph (d)(1)(i) through (d)(1)(xi) of this section:

(i) Determine the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d).

(ii) Determine the capture system capture efficiency (F) in accordance with 40 CFR 63.827(e)-(f).

(iii) Calculate the overall organic HAP control efficiency, (R), achieved using Equation 13.

(iv) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on materials applied or emission of less than the calculated allowable organic HAP, measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material applied on the press or group of presses controlled by a common solvent recovery device during the month.

(v) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(b)(2).

(vi) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).

(vii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, calculate the organic HAP emitted during the month, H , for each month using Equation 14.

(viii) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, calculate the organic HAP emission rate based on solids applied, L , for each month using Equation 15.

(ix) If demonstrating compliance on the basis of organic HAP emission rate based on materials applied, calculate the organic HAP emission rate based on material applied, S , using Equation 16.

(x) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with 40 CFR 63.828(a)(4)-(5) whenever a product and packaging rotogravure or wide-web flexographic press is operating.

(xi) The affected source is in compliance, if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with 40 CFR 63.828(a)(4) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with 40 CFR 63.828(a)(5) for each three hour period, and

(A) The overall organic HAP control efficiency, R , is 95 percent or greater, or

(B) The organic HAP emission rate based on solids applied, L , is 0.20 kg organic HAP per kg solids applied or less, or

(C) The organic HAP emission rate based on material applied, S , is 0.04 kg organic HAP per kg

material applied or less, or

(D) The organic HAP emitted during the month, H, is less than the calculated allowable organic HAP, H_a , as determined using paragraph (e) of this section.

(2) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency.

Compliance shall be demonstrated in accordance with the requirements of paragraph (c)(2) of this section.

(e) Owners or operators may calculate the monthly allowable HAP emissions, H_a , for demonstrating compliance in accordance with paragraph (b)(6), (c)(1)(xi)(D), (c)(2)(xi)(D), or (d)(1)(xi)(D) of this section as follows:

(1) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, M_i .

(2) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with 40 CFR 63.827(c)(2), C_{si} .

(3) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis, G_i .

(4) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month, M_{Lj} .

(5) Calculate the monthly allowable HAP emissions, H_a , using Equation 17.

$$H_a = 0.20 \left[\sum_{i=1}^p M_i G_i C_{si} \right] + 0.04 \left[\sum_{i=1}^p M_i (1 - G_i) + \sum_{j=1}^q M_{Lj} \right]$$

Eq 17

(f) Owners or operators of product and packaging rotogravure or wide-web flexographic printing presses shall demonstrate compliance according to the procedures in paragraphs (f)(1) through (f)(7) of this section if the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controllable work stations.

(1) The owner or operator of each solvent recovery system used to control one or more product and packaging rotogravure or wide-web flexographic presses for which the owner or operator chooses to comply by means of a liquid-liquid mass balance shall determine the organic HAP emissions for those presses controlled by that solvent recovery system either

(i) In accordance with paragraphs (c)(1)(i)-(iii) and (c)(1)(v)-(viii) of this section if the presses controlled by that solvent recovery system have only always-controlled work stations, or

(ii) In accordance with paragraphs (c)(1)(ii)-(iii), (c)(1)(v)-(vi), and (g) of this section if the presses controlled by that solvent recovery system have one or more never-controlled or intermittently-controllable work stations.

(2) The owner or operator of each solvent recovery system used to control one or more product and packaging rotogravure or wide-web flexographic presses, for which the owner or operator chooses to comply by means of an initial test of capture efficiency, continuous emission monitoring of the control device, and continuous monitoring of a capture system operating parameter, shall

(i) for each capture system delivering emissions to that solvent recovery system, monitor an operating parameter established in accordance with 40 CFR 63.828(a)(5) to assure capture system efficiency, and

(ii) Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that solvent recovery system either

(A) In accordance with paragraphs (c)(2)(i)-(iii) and (c)(2)(v)-(viii) of this section if the presses served by that capture system have only always-controlled work stations, or

(B) In accordance with paragraphs (c)(2)(ii)-(iii), (c)(2)(v)-(vii), and (g) of this section if the presses served by that capture system have one or more never-controlled or intermittently-controllable work stations.

(3) The owner or operator of each oxidizer used to control emissions from one or more product

and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters, shall

(i) Monitor an operating parameter established in accordance with 40 CFR 63.828(a)(4) to assure control device efficiency, and

(ii) for each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR 63.828(a)(5) to assure capture efficiency, and

(iii) Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that oxidizer either

(A) in accordance with paragraphs (d)(1)(i)-(v) and (d)(1)(vii) of this section if the presses served by that capture system have only always-controlled work stations, or

(B) in accordance with paragraphs (d)(1)(i)-(iii), (d)(1)(v), and (g) of this section if the presses served by that capture system have one or more never-controlled or intermittently-controllable work stations.

(4) The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through an initial capture efficiency test, continuous emission monitoring of the control device and continuous monitoring of a capture system operating parameter, shall

(i) for each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR 63.828(a)(5) to assure capture efficiency, and

(ii) Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that oxidizer either

(A) In accordance with paragraphs (c)(2)(i)-(iii) and (c)(2)(v)-(viii) of this section if the presses served by that capture system have only always-controlled work stations, or

(B) In accordance with paragraphs (c)(2)(ii)-(iii), (c)(2)(v)-(vii), and (g) of this section if the presses served by that capture system have one or more never-controlled or intermittently-controllable work stations.

(5) The owner or operator of one or more uncontrolled product and packaging rotogravure or wide-web flexographic printing presses shall determine the organic HAP applied on those presses using Equation 8. The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

(6) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, the owner or operator shall determine the solids content of each ink, coating, varnish, adhesive, primer, solvent and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).

(7) The owner or operator shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to paragraphs (f)(1), (f)(2)(ii), (f)(3)(iii), (f)(4)(ii), and (f)(5) of this section. The affected source is in compliance for the month, if all operating parameters required to be monitored under paragraphs (f)(2)-(4) of this section were maintained at the appropriate values, and

(i) The total mass of organic HAP emitted by the affected source was not more than four percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners and other materials applied by the affected source, or

(ii) The total mass of organic HAP emitted by the affected source was not more than 20 percent of the total mass of solids applied by the affected source, or

(iii) The total mass of organic HAP emitted by the affected source was not more than the equivalent allowable organic HAP emissions for the affected source, H_a , calculated in accordance with paragraph (e) of this section, or

(iv) The total mass of organic HAP emitted by the affected source was not more than five percent of the total mass of organic HAP applied by the affected source. The total mass of organic HAP applied by the affected source in the month shall be determined by the owner or operator using Equation 8.

(g) Owners or operators determining organic HAP emissions from a press or group of presses having one or more never-controlled or intermittently-controllable work stations and using the

procedures specified in paragraphs (f)(1)(ii), (f)(2)(ii)(B), (f)(3)(iii)(B), or (f)(4)(ii)(B) of this section shall for that press or group of presses:

- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
- (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
- (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
- (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
- (5) For each press or group of presses for which the owner or operator uses the provisions of paragraph (f)(1)(ii) of this section, the owner or operator shall calculate the organic HAP emitted during the month using Equation 18.

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] \left[1 - \frac{M_{vr}}{\sum_{i=1}^p M_{Ci} C_{vi} + \sum_{j=1}^q M_{Cj}} \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

Eq 18

- (6) For each press or group of presses for which the owner or operator uses the provisions of

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] \left[1 - \left(\frac{E}{100} \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

Eq 19

paragraphs (f)(2)(ii)(B), (f)(3)(iii)(B), or (f)(4)(ii)(B) of this section, the owner or operator shall calculate the organic HAP emitted during the month using Equation (19).

(h) If the affected source operates more than one capture system or more than one control device, and has no never-controlled work stations and no intermittently-controllable work stations, then the affected source is in compliance with the 95 percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:

- (1) The volatile matter collection and recovery efficiency, R_v , as determined by paragraphs (c)(1)(i), (c)(1)(iii), and (c)(1)(v)-(vii) of this section is equal to or greater than 95 percent, or
- (2) the overall organic HAP control efficiency as determined by paragraphs (c)(2)(iii) and (c)(2)(v)-(vii) of this section for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with 40 CFR 63.828(a)(5) for each three hour period, or
- (3) the overall organic HAP control efficiency as determined by paragraphs (d)(1)(i)-(iii) and (d)(1)(x) of this section for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent, the oxidizer is operated such that

the average operating parameter value is greater than the operating parameter value established in accordance with 40 CFR 63.828(a)(4) for each three hour period, and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with 40 CFR 63.828(a)(5) for each three hour period.

63.826 Compliance dates.

(a) The compliance date for an owner or operator of an existing affected source subject to the provisions of this subpart is May 30, 1999.

(c) Affected sources which have undergone reconstruction are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment are not considered in determining whether the affected source has been reconstructed. Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs.

63.827 Performance test methods.

(a) An owner or operator using a control device to comply with the requirements of 40 CFR 40 CFR 63.824-63.825 is not required to conduct an initial performance test to demonstrate compliance if one or more of the criteria in paragraphs (a)(1) through (a)(3) of this section are met:

- (1) A control device that is in operation prior to 5/30/96 does not need to be tested if
 - (i) it is equipped with continuous emission monitors for determining inlet and outlet total organic volatile matter concentration, and capture efficiency has been determined in accordance with the requirements of this subpart, such that an overall HAP control efficiency can be calculated, and
 - (ii) the continuous emission monitors are used to demonstrate continuous compliance in accordance with 40 CFR 63.828, or
- (2) the owner or operator has met the requirements of either 40 CFR 63.7(e)(2)(iv) or 40 CFR 63.7(h), or
- (3) the control device is a solvent recovery system and the owner or operator chooses to comply by means of a monthly liquid-liquid material balance.

(b) Determination of the organic HAP content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials for the purpose of meeting the requirements of 40 CFR 63.824 shall be conducted according to paragraph (b)(1) of this section. Determination of the organic HAP content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials for the purpose of meeting the requirements of 40 CFR 63.825 shall be conducted according to paragraph (b)(2) of this section.

(1) Each owner or operator of a publication rotogravure facility shall determine the organic HAP weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material used in a publication rotogravure affected source by following one of the procedures in paragraphs (b)(1)(i) through (b)(1)(iii) of this section:

(i) The owner or operator may test the material in accordance with Method 311 of Appendix A of Part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Permitting authority. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

(ii) The owner or operator may determine the volatile matter content of the material in accordance with 40 CFR 63.827(c)(1) and use this value for the organic HAP content for all compliance purposes.

(iii) The owner or operator may, except as noted in paragraph (b)(1)(iv) of this section, rely on formulation data provided by the manufacturer of the material on a CPDS if

(A) the manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and

(B) the manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of Appendix A of Part 63, or by an alternate method approved by the Permitting authority, or by reliance on a CPDS from a raw material supplier prepared in accordance with 40 CFR 63.827(b)(1)(iii)(A).

(iv) In the event of any inconsistency between the Method 311 of Appendix A of Part 63 test data and formulation data, that is, if the Method 311 test value is higher, the Method 311 test data shall govern, unless after consultation, an owner or operator demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.

(2) Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following one of the procedures in paragraphs (b)(2)(i) through (b)(2)(iii) of this section:

(i) The owner or operator may test the material in accordance with Method 311 of Appendix A of Part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Permitting authority. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

(ii) The owner or operator may determine the volatile matter content of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the organic HAP content for all compliance purposes.

(iii) The owner or operator may, except as noted in paragraph (b)(2)(iv) of this section, rely on formulation data provided by the manufacturer of the material on a CPDS if

(A) the manufacturer has included in the organic HAP content determination, all organic HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and

(B) the manufacturer has determined the organic HAP content of each raw material present in the formulation by Method 311 of Appendix A of Part 63, or, by an alternate method approved by the Permitting authority, or, by reliance on a CPDS from a raw material supplier prepared in accordance with 40 CFR 63.827(b)(2)(iii)(A).

(iv) In the event of any inconsistency between the Method 311 of Appendix A of Part 63 test data and a facility's formulation data, that is, if the Method 311 test value is higher, the Method 311 test data shall govern, unless after consultation, an owner or operator demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.

(c) Determination by the owner or operator of the volatile matter content of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, diluents, and other materials used for the purpose of meeting the requirements of 40 CFR 63.824 shall be conducted according to paragraph (c)(1) of this section. Determination by the owner or operator of the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, diluents, and other materials applied for the purpose of meeting the requirements of 40 CFR 63.825 shall be conducted according to paragraph (c)(2) of this section.

(1) Each owner or operator of a publication rotogravure facility shall determine the volatile matter weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material used using Method 24A of 40 CFR Part 60, Appendix A. The Method 24A determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 24A, the owner or operator shall submit an alternative technique for determining their values for approval by the Permitting authority. The owner or operator may rely on formulation data, subject to the provisions of paragraph (c)(3) of this section.

(2) Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values

cannot be determined using Method 24, the owner or operator shall submit an alternative technique for determining their values for approval by the Permitting authority. The owner or operator may rely on formulation data, subject to the provisions of paragraph (c)(3) of this section. (3) Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Appendix A, the applicable test method shall govern, unless after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) A performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of 40 CFR 40 CFR 63.824-63.825 shall be conducted by the owner or operator in accordance with the following:

(1) An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR Part 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR Part 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR Part 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR Part 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR Part 60,

Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in paragraphs (d)(1)(vi)(A)-(C) of this section. The owner or operator shall submit notice of the intended test method to the Permitting authority for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR part 60, Appendix A, if

(A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the standards of 40 CFR 40 CFR 63.824-63.825, or

(B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using Equation 20:

$$M_f = Q_{sd} \left[\sum_{i=1}^n C_i MW_i \right] [0.0416] [10^{-6}]$$

Eq 20

(ix) Emission control device efficiency shall be determined using Equation 21:

$$E = \frac{M_{fi} - M_{fo}}{M_{fi}}$$

Eq 21

(2) The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up,

shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(3) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of 40 CFR 40 CFR 63.824-63.825.

(e) A performance test to determine the capture efficiency of each capture system venting organic emissions to a control device for the purpose of meeting the requirements of 40 CFR 40 CFR 63.824(b)(1)(ii), 63.824(b)(2), 63.825(c)(2), 63.825(d)(1)-(2), 63.825(f)(2)-(4), or 63.825(h)(2)-(3) shall be conducted by the owner or operator in accordance with the following:

(1) For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T - Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in Appendix B to 40 CFR 52.741 of part 52 of this chapter shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(2) For temporary total enclosures, the capture efficiency shall be determined according to the protocol specified in 40 CFR 52.741(a)(4)(iii)(B) of part 52 of this chapter. The owner or operator may exclude never-controlled work stations from such capture efficiency determinations.

(f) As an alternative to the procedures specified in 40 CFR 63.827(e) an owner or operator required to conduct a capture efficiency test may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The owner or operator may exclude never-controlled work stations from such capture efficiency determinations. [40 CFR 63.827(f)]

63.828 Monitoring requirements.

(a) Following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the owner or operator shall monitor and inspect each control device required to comply with 40 CFR 40 CFR 63.824-63.825 to ensure proper operation and maintenance by implementing the applicable requirements in paragraph (a)(1) through (a)(5) of this section.

(1) Owners or operators of product and packaging rotogravure or wide-web flexographic presses with intermittently-controllable work stations shall follow one of the procedures in paragraphs (a)(1)(i) through (a)(1)(iv) of this section for each dryer associated with such a work station:

(i) Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device. The time and flow control position must be recorded at least once per hour, as well as every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.

(ii) Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; a visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.

(iii) Ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position. The monitoring system shall be inspected at least once every month to ensure that it is functioning properly.

(iv) Use an automatic shutdown system in which the press is stopped when flow is diverted away from the control device to any bypass line. The automatic system shall be inspected at least once every month to ensure that it is functioning properly.

(2) Compliance monitoring shall be subject to the provisions of paragraphs (a)(2)(i) and (a)(2)(ii) of

this section, as applicable.

(i) All continuous emission monitors shall comply with performance specifications (PS) 8 or 9 of 40 CFR Part 60, Appendix B, as appropriate. The requirements of Appendix F of 40 CFR Part 60 shall also be followed. In conducting the quarterly audits required by Appendix F, owners or operators must challenge the monitors with compounds representative of the gaseous emission stream being controlled.

(ii) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(3) An owner or operator complying with 40 CFR 40 CFR 63.824-63.825 through continuous emission monitoring of a control device shall install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at both the control device inlet and the outlet.

(4) An owner or operator complying with the requirements of 40 CFR 40 CFR 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:

(i) For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(ii) For a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(5) An owner or operator complying with the requirements of 40 CFR 40 CFR 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:

(i) Submit to the Permitting authority with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that

(A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,

(B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and

(C) Identifies the specific monitoring procedures;

(ii) Set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 40 CFR 63.824-63.825, and

(iii) Conduct monitoring in accordance with the plan submitted to the Permitting authority unless comments received from the Permitting authority require an alternate monitoring scheme. [40 CFR 63.828(a)]

(b) Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a)(4) and (a)(5) of this section, unless otherwise excused, shall be considered a violation of the emission standard. [40 CFR 63.828(b)]

40 CFR 63.829 Recordkeeping Requirements.

(a) The recordkeeping provisions of 40 CFR 63 subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.

(b) Each owner or operator of an affected source subject to this subpart shall maintain the records specified in paragraphs (b)(1) through (b)(3) of this section on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) of this part:

(1) Records specified in 40 CFR 63.10(b)(2) of this part, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in 40 CFR 63.10(b)(3) of this part for each applicability determination performed by the owner or operator in accordance with the requirements of 40 CFR 63.820(a) of this subpart, and

(3) Records specified in 40 CFR 63.10(c) of this part for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40 CFR 63.828(a) of this subpart.

(c) Each owner or operator of an affected source subject to this subpart shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 40 CFR 63.824-63.825 of this subpart. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b) of this part.

(d) The owner or operator of each facility which commits to the criteria of 40 CFR 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.

(e) The owner or operator of each facility which meets the limits and criteria of 40 CFR 63.821(b)(1) shall maintain records as required in paragraph (e)(1) of this section. The owner or operator of each facility which meets the limits and criteria of 40 CFR 63.821(b)(2) shall maintain records as required in paragraph (e)(2) of this section. Owners or operators shall maintain these records for five years, and upon request, submit them to the Permitting authority.

(1) For each facility which meets the criteria of 40 CFR 63.821(b)(1), the owner or operator shall maintain records of the total volume of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

(2) For each facility which meets the criteria of 40 CFR 63.821(b)(2), the owner or operator shall maintain records of the total volume and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

63.830 Reporting Requirements.

(a) The reporting provisions of 40 CFR Part 63 subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.

(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 Permitting authority:

(1) An initial notification required in 40 CFR 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in 40 CFR 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR 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 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 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.

(2) A Notification of Performance Tests specified in 40 CFR 63.7 and 40 CFR 63.9(e) of this part. This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan

- shall be considered to be approved unless explicitly disapproved, or unless comments received from the Permitting authority require monitoring of an alternate parameter.
- (3) A Notification of Compliance Status specified in 40 CFR 63.9(h) of this part.
 - (4) Performance test reports specified in 40 CFR 63.10(d)(2) of this part.
 - (5) Start-up, shutdown, and malfunction reports specified in 40 CFR 63.10(d)(5) of this part, except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.
 - (i) If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3) of this part, the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Permitting authority.
 - (ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (b)(6) of this section.
 - (6) A summary report specified in 40 CFR 63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include, as applicable:
 - (i) Exceedances of the standards in 40 CFR 40 CFR 63.824-63.825.
 - (ii) Exceedances of either of the criteria of 40 CFR 63.820(a)(2).
 - (iii) Exceedances of the criterion of 40 CFR 63.821(b)(1) and the criterion of 40 CFR 63.821(b)(2) in the same month.
 - (iv) Exceedances of the criterion of 40 CFR 63.821(a)(2)(ii)(A).

§63.831 Delegation of authority.

- (a) In delegating implementation and enforcement authority to a State under 40 CFR part 63 subpart E of this part, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.
- (b) Authority which will not be delegated to States: §63.827(b), approval of alternate test method for organic HAP content determination; §63.827(c), approval of alternate test method for volatile matter determination.

TABLE 1 TO SUBPART KK. – APPLICABILITY OF GENERAL PROVISIONS TO SUBPART KK

General Provisions Reference	Applicable to Subpart KK	Comment
40 CFR 63.1(a)(1)- (a)(4)	Yes	
40 CFR 63.1(a)(10)- (a)(14)	Yes	
40 CFR 63.1(b)(2)- (b)(3)	Yes	
40 CFR 63.1(c)(1)	Yes	
40 CFR 63.1(c)(4)	Yes	
40 CFR 63.1(e)	Yes	
40 CFR 63.2	Yes	Additional definitions in subpart KK
40 CFR 63.3(a)-(c)	Yes	
40 CFR 63.4(a)(1)- (a)(3)	Yes	
40 CFR 63.4(a)(5)	Yes	

General Provisions Reference	Applicable to Subpart KK	Comment
40 CFR 63.4(b-c)	Yes	
40 CFR 63.5(a)(1)- (a)(2)	Yes	
40 CFR 63.5(b)(1)	Yes	
40 CFR 63.5(b)(3)- (b)(6)	Yes	
40 CFR 63.5(d)	Yes	
40 CFR 63.5(e)	Yes	
40 CFR 63.5(f)	Yes	
40 CFR 63.6(a)	Yes	
40 CFR 63.6(b)(1)- (b)(5)	Yes	
40 CFR 63.6(b)(7)	Yes	
40 CFR 63.6(c)(1)- (c)(2)	Yes	
40 CFR 63.6(c)(5)	Yes	
40 CFR 63.6(e)	Yes	Provisions pertaining to start-ups, shutdowns, malfunctions, and CMS do not apply unless an add-on control system is used
40 CFR 63.6(f)	Yes	
40 CFR 63.6(g)	Yes	
40 CFR 63.6(i)(1)- (i)(14)	Yes	
40 CFR 63.6(i)(16)	Yes	
40 CFR 63.6(j)	Yes	
40 CFR 63.7	Yes	
40 CFR 63.8(a)(1)- (a)(2)	Yes	
40 CFR 63.8(b)	Yes	
40 CFR 63.8(c)(1)-(3)	Yes	
40 CFR 63.8(c)(6)- (c)(8)	Yes	Provisions for COMS are not applicable
40 CFR 63.8(d)-(f)	Yes	
40 CFR 63.9(a)	Yes	
40 CFR 63.9(b)(1)	Yes	
40 CFR 63.9(b)(2)	Yes	Initial notification submission date extended
40 CFR 63.9(b)(3)- (b)(5)	Yes	
40 CFR 63.9(c)-(e)	Yes	
40 CFR 63.9(g)	Yes	Provisions for COMS are not applicable
40 CFR 63.9(h)(1)- (h)(3)	Yes	
40 CFR 63.9(h)(5)- (h)(6)	Yes	

General Provisions Reference	Applicable to Subpart KK	Comment
40 CFR 63.9(i)	Yes	
40 CFR 63.9(j)	Yes	
40 CFR 63.10(a)	Yes	
40 CFR 63.10(b)(1)- (b)(3)	Yes	
40 CFR 63.10(c)(1)	Yes	
40 CFR 63.10(c)(5)- (c)(8)	Yes	
40 CFR 63.10(c)(10)- (c)(15)	Yes	
40 CFR 63.10(d)(1)- (d)(2)	Yes	
40 CFR 63.10(d)(4)- (d)(5)	Yes	
40 CFR 63.10(e)	Yes	Provisions for COMS are not applicable
40 CFR 63.10(f)	Yes	
40 CFR 63.12	Yes	
40 CFR 63.13	Yes	
40 CFR 63.14	Yes	
40 CFR 63.15	Yes	

E.1.3 One Time Deadlines Relating to NESHAP KK

The Permittee must conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by May 30, 1999. The initial performance test was conducted on January 15, 1999.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-21426-00007

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-21426-00007

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">C 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); andC 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
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-21426-00007
Facility: Presses #1 - #4 emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-10
Parameter: Volatile organic compounds (VOC) usage
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-21426-00007
Facility: Parts Washer PW2
Parameter: Volatile organic compounds (VOC)
Limit: The total VOC consumption in parts washer PW2 shall be limited to 28.45 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Multi-Color Corporation
 Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
 Mailing Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
 Part 70 Permit No.: T143-21426-00007

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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Permit Renewal**

Source Background and Description

Source Name:	Multi-Color Corporation
Source Location:	2281 South U.S. 31, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	2754
Operation Permit No.:	T143-21426-00007
Permit Reviewer:	Surya Ramaswamy / EVP

On October 28, 2006, the Office of Air Quality (OAQ) had a notice published in the Scott County Journal, Scottsburg, Indiana, stating that Multi-Color Corporation had applied for a Part 70 permit renewal for the stationary packaging rotogravure printing operation. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

On November 27, 2006, Leonard Underwood, Plant Engineer at Multi-Color Corporation submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

In Section A.1, General Information, the "Responsible Official" should be identified as "Mike Cook". Mr. Cook is the Plant Manager at the facility.

Response 1

The following change has been made to Section A.1 as requested.

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

The Permittee owns and operates stationary packaging rotogravure printing operation.

Responsible Official:	Andy Battjes Mike Cook
Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
General Source Phone Number:	(812)752-8205

Comment 2

In Section A.2(d), Emission Units and Pollution Control Equipment, Press #4 should be identified as being installed in 2004.

Response 2

The following change has been made to the description of Press #4 in Sections A.1, D.1 and D.2 as requested.

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

.....

- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of ~~1997~~ **2004**, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source; and

SECTION D.1 FACILITY OPERATION CONDITIONS

For Printing Stations Using Compliant (i.e., Water-based) Materials

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

...

- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of ~~1997~~ **2004**, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

For Printing Stations Using Solvent-Based Materials

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

...

- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of ~~1997~~ **2004**, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

SECTION E.1 FACILITY OPERATION CONDITIONS

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

...

- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of ~~1997~~ **2004**, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

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

Comment 3

In Section A.3, Specifically Regulated Insignificant Activities, It appeared that many of the insignificant activities listed in Section A.3 of the previous (Current) Part 70 operating Permit are not included in the draft Part 70 Operating Permit. Would you please explain why the previously listed insignificant activities with emissions below insignificant levels are not listed in the draft Part 70 Operating Permit.

Response 3

Insignificant emission units not subject to any regulations are not required to be listed in the Part 70 operating permit. However, all the insignificant activities are listed in the Technical Support Document to the Part 70 Permit. There will be no change as a result of this comment.

Comment 4

In Section D.1.6, Testing Requirements, it appears that the permit requires that within 180 days of issuance of the permit a performance test is required on the facility's four rotogravure presses to demonstrate the control efficiency of the facility's regenerative thermal oxidizer and two catalytic oxidizers. As the existing (Current) Part 70 Operating permit requires performance testing be performed once every 30 months, Multi-Color Corporation is planning on conducting performance testing in January 2007. If the draft Part 70 operating Permit is finalized after this performance testing is completed, say February, 2007, would Multi-Color Corporation be required to conduct a separate, additional performance test within 180 days of the issuance of the permit?

Response 4

Multi-Color Corporation will not be required to conduct the stack test after the permit issuance if the stack test will be conducted in January 2007. As long as the stack test is performed once every 30 months, the source will comply with the requirement. There will be no change as a result of this comment.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Multi-Color Corporation
Source Location:	2281 South U.S. 31, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	2754
Operation Permit No.:	T143-9310-00007
Operation Permit Issuance Date:	April 16, 2001
Permit Renewal No.:	T143-21426-00007
Permit Reviewer:	Surya Ramaswamy / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Multi-Color Corporation, relating to the operation of an existing stationary packaging rotogravure printing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.

- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source.
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source; and
- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

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 (10) million Btu per hour:
 - (1) One (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004 [326 IAC 6-2-4].
- (b) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.
- (c) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to [326 IAC 20-6], [326 IAC 8-3-2] and [326 IAC 8-3-5].
- (d) Other categories with emissions below insignificant thresholds:
 - (1) One (1) corona treater unit which generates ozone at a rate of 0.074 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for Press #2 treater: 16 kW = 5.18 tons per year ozone maximum.
 - (2) One (1) 10,000 gallon, three-compartment horizontal solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;
 - (3) One (1) 8,000 gallon vertical solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;

- (4) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day;
- (5) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches;
- (6) Two (2) cyclone separators for collecting paper and plastic trim generated from label trimming operations, which is then fed to a bailer which bales the material in preparation for off-site recycling or disposal. Potential PM-10 emissions from this operation are less than 25 pounds per day;
- (7) One (1) seaming machine has a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 140 meters per minute (mpm);
- (8) One (1) Electron Beam ink cure analyzer for testing cure strength of EB coatings; and
- (9) One (1) high speed seaming machine, has a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).

Existing Approvals

The source has been operating under Part 70 permit 143-9310-00007, issued on April 16, 2001, and the following subsequent approvals:

- | | |
|---|--------------------------------|
| (a) First Administrative Amendment: 143-15020-00007 | Date Issued: December 5, 2001 |
| (b) First Significant Permit Modification: 143-16498-00007 | Date Issued: March 25, 2003 |
| (c) Second Administrative Amendment: 143-17615-00007 | Date Issued: May 8, 2003 |
| (d) Second Significant Permit Modification: 143-18221-00007 | Date Issued: March 2, 2004 and |
| (e) Third Administrative Amendment: 143-19147-00007 | Date Issued: July 16, 2004. |

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.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit renewal application for the purposes of this review was received on July 12, 2005.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A of this document for detailed emission calculations in Appendix A, pages 1 through 8.

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on April 16, 2001. 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 the original Part 70 operating Permit 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	HAPs
Natural Gas Combustion	7.8	7.8	0.61	5.65	86.21	183.05	1.89 (Hexane) 1.97 (Total)
Presses #1 - #4	0.00	0.00	0.00	200.54	0.00	0.00	77.76 (Toluene) 79.65 (Total)
Solvent degreasing	0.00	0.00	0.00	28.45	0.00	0.00	0.00
Insignificant	0.00	0.00	0.00	14.69	0.00	0.00	0.00
Total PTE	7.8	7.8	0.6	249.33	86.2	183.1	77.76 (Toluene) 79.65 (Total)

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) 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 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. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.0
PM-10	1.0
SO ₂	0.0
VOC	61.0
CO	6.0
NO _x	7.0
HAP (specify)	Not specified

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM2.5	Attainment or Unclassifiable
PM-10	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
8-hour Ozone	Attainment or Unclassifiable
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x 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.
- (b) Scott County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Scott 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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 63, Subpart Dc), are not included in the permit because the natural gas fired 6 MMBtu per hour hot oil boiler at Press #3 (see Insignificant Activities) was constructed after June 9, 1989, and it has a heat input capacity less than 10 MMBtu per hour.

40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (40 CFR 63, Subpart Kb), are not included in the permit because the one (1) 10,000 gallon isopropyl acetate storage tank, and one (1) 8,000 gallon isopropyl acetate storage tank each have a storage capacity less than 75 cubic meters.

40 CFR Part 60, Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing)

The requirements of the New Source Performance Standard 326 IAC 12, (40 CFR Part 60.430 through 60.435, Subpart QQ), are not included in the permit because it is a packaging rotogravure printing press, not a publication rotogravure printing press to which Subpart QQ applies.

40 CFR Part 63, Subpart T (National Emissions Standards for Halogenated Solvent Cleaning)

The requirements of the National Emission Standards Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.460 through 63.480, Subpart T), are not included in the permit because they do not utilize any of the halogenated solvents (methylene chloride, perchloroethylene, trichloroethylene, 1, 1, 1-trichloroethane, carbon tetrachloride, or chloroform), or any combination of these halogenated HAP solvents in a total concentration greater than 5 percent by weight.

40 CFR Part 63, Subpart KK (National Emissions Standards for Printing and Publishing Industry)

This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart KK) because this source performs packaging rotogravure printing and is a major source of Hazardous Air Pollutants (HAPs). Therefore, the requirements of *National Emissions Standards for Hazardous for the printing and publishing industry*, (40 CFR 63, Subpart KK) are included in the permit.

The specific affected facilities include:

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 204.0 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P3U1-P3U8 are controlled by one (1) catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack identified as S-OXD2. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #3 (eight stations: P3U1 through P3U8) are considered an existing affected source; and
- (d) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart KK.

- (a) 40 CFR 63.820 (a);
- (b) 40 CFR 63.821;
- (c) 40 CFR 63.822;
- (d) 40 CFR 63.823;
- (e) 40 CFR 63.825;
- (f) 40 CFR 63.826 (a) and (c);
- (g) 40 CFR 63.827;
- (h) 40 CFR 63.828;
- (i) 40 CFR 63.829, except 40 CFR 63.829 (f);
- (j) 40 CFR 63.830; and
- (k) 40 CFR 63.831.

The provisions of 40 CFR 63 Subpart A – General Provisions apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart KK.

40 CFR Part 63, Subpart JJJJ (National Emission Standards for Paper and Other Web Coating)
Pursuant to 40 CFR 63.3300, the requirements of the National Emission Standards Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.3280 through 63.3420, Subpart JJJJ), are not included in the permit because all the web coating lines at the source are subject to the requirements of 40 CFR 63, Subpart KK.

40 CFR Part 63, Subpart DDDDD (National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters)

Pursuant to 40 CFR 63.7575, the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in the permit for the two (2) natural gas fired press dryers, each with a maximum heat input rating of 7.76 million British thermal units (MMBtu) per hour, one (1) natural gas fired boiler with a maximum heat input capacity of six (6) MMBtu/hr and one (1) natural gas firing unit with a maximum heat input capacity of five (5) million British thermal units (MMBtu) because these natural gas firing units have a rated capacity of less than or equal to ten million British thermal units per hour heat input. However, pursuant to 40 CFR 63.75-6(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.

40 CFR Part 64, (Compliance Assurance Monitoring)

In order for this rule to apply, a pollutant specific emissions unit as defined in 40 CFR 64.1 must meet the following three criteria for a given pollutant:

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

The packaging rotogravure printing Presses #1 through #4 meet the criteria for Compliance Assurance Monitoring applicability as defined in 40 CFR 64.1. Pursuant to 40 CFR 64.2 (b) (i), since the packaging rotogravure printing Presses #1 through #4 are subject to 40 CFR 63, Subpart KK, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to these units.

State Rule Applicability – Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on August 21, 1998 for the oxidizer OXD#2. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

The source shall submit a Preventive Maintenance Plan (PMP) for the one (1) catalytic oxidizer, identified as OXD#5 and one (1) regenerative thermal oxidizer, identified as OXD#6.

326 IAC 2-2 (Prevention of Significant Deterioration)

In Part 70 Operating permit T143-9310-00007, issued on April 16, 2001, the source was determined to be a major source under 326 IAC 2-2 (PSD) for volatile organic compound (VOC) emissions. However, through the T143-9310-00007 permit, the source-wide potential to emit VOC was limited to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD). From the time of issuance of this permit, the source has undergone two (2) Significant Permit Modifications and three (3) Administrative Amendments. After these modifications were incorporated into the current permit (T143-21426-00007) the minimum overall control efficiency for the presses has increased from 94% to 94.20% to limit the source wide potential to emit VOC less than the 250 tons per year to remain a minor source under 326 IAC 2-2. Based on the 2003 OAQ data the actual emissions from the source have never exceeded the PSD thresholds. The source has to achieve the following limits in order to remain a minor source under 326 IAC 2-2:

- (1) The printing operations shall be limited as follows:
 - (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 - #4 (emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-10) shall be limited to 3,458 tons per twelve (12) consecutive month period with compliance determined at the end of each month. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall control efficiency of 94.20%. This will limit the potential to emit VOC from Presses #1 - #4 (P1U1-10, P2U1-9, P3U1-8, and P4U1-8) to 200.58 tons per twelve (12) consecutive month period.
- (2) The cold cleaner degreasing operations at the source shall be limited as follows:
 - (a) The total VOC consumption in parts washer PW2 shall be limited to 28.45 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to a VOC emission limit of 28.45 tons per year.

These VOC limits combined with unrestricted VOC emissions from insignificant activities at the source (5.65 tons VOC/yr from natural gas combustion and 14.69 tons per year from other insignificant activities) shall limit the source wide potential to emit of VOC to less than 250 tons per year. Therefore, 326 IAC 2-2 (PSD) is not applicable and this source qualifies as a minor source under this rules.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has potential to emit greater than or equal to 250 tons per year of VOC; therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. 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 (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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Exempt from this requirement are those major sources regulated by a standard issued pursuant to Section 112(d) of the Clean Air Act of 1990. 40 CFR Part 63, Subpart KK (National Emissions Standards for Printing and Publishing Industry), which has been issued by USEPA pursuant to Section 112(d) of the Clean Air Act of 1990, applies to this source. Therefore, 326 IAC 2-4.1-1 does not apply to this source.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 6.0 million Btu per hour (MMBtu/hr) natural gas fired hot oil boiler TH1 is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26} \text{ where: } Pt = \text{pounds of PM emitted per MMBtu heat input (lb/MMBtu)} \\ Q = \text{total source operating capacity (MMBtu/hr)}$$

$$Pt = 1.09 / 6.0^{0.26} = 0.68 \text{ lb/MMBtu, however, pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.}$$

The 6.0 MMBtu/hr natural gas fired hot oil boiler TH1 shall comply with the PM emission limit of 0.6 lb/MMBtu as follows:

$$\text{PM emissions (tons per year)} = (0.6 \text{ lb/MMBtu}) * (6.0 \text{ MMBtu/hr}) * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lbs}) = 15.8 \text{ tons/year}$$

The potential PM emissions for the boiler of 0.20 tons per year, (see Appendix A, page 3 of 8, for detailed calculations) are less than the 15.8 tons per year emission rate, therefore, this boiler complies with the rule.

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

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), facilities not regulated by other rules in Article 8, with potential VOC emissions equal to or greater than 25 tons per year, shall comply utilizing the Best Available Control Technology.

- (a) The four (4) packaging rotogravure printing presses are subject to 326 IAC 8-5-5 (Graphic Arts Operations), therefore, they are not subject to this rule.
- (b) The two (2) degreasing operations are subject to 326 IAC 8-3-2 or 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), therefore, they are not subject to this rule.

326 IAC 8-3-2 (Cold Cleaner Operations)

The parts washer PW2 and other insignificant degreasing operations are subject to this rule because the facilities are constructed after 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner degreasing operation PW2 and other insignificant degreasing operations are subject to this rule because it was constructed after July 1, 1990 in Scott County. This degreasing operation shall comply with the following requirements.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

The packaging rotogravure printing Presses #1 through #4 are subject to 326 IAC 8-5-5 because they were constructed after 1980 and have 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 percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more of nonvolatile material; or
- (c) The owner or operator installs and operates a control device (i.e. incineration system) that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water and utilizes a capture system that, when used in conjunction with the control device, shall attain an efficiency sufficient to achieve an overall VOC control efficiency of sixty-five percent (65%); and
- (d) The ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.

The source shall comply with the VOC content limitations specified above by either using water based materials (Section D.1) or utilizing a VOC capture and control system with an overall VOC control efficiency of 94.20% at presses #1 - #4 when utilizing solvent based materials (Section D.2). Therefore, the source is in compliance with this rule.

326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations)

The Offset Gravure Coater station with an Electron Beam Curing Unit is subject to 326 IAC 8-2-5 because this unit applies coating to labels. Pursuant to this rule, no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a label coating line. Based on the manufacturer's data, the coatings are in compliance.

Testing Requirements

Pursuant to 40 CFR 63 Subpart KK (§63.827), compliance stack tests shall be performed on the Press #1 and Press #2 capture system, regenerative thermal oxidizer, identified as OXD#6 and on the Press #3 and Press #4 capture systems, catalytic oxidizing incinerators, identified as OXD#2 and OXD#5 to monitor the incinerator's chamber temperatures and the capture, destruction and overall efficiencies of the Presses #1 - #4 control systems, to demonstrate compliance with the limits and emission standards of Operation Conditions 40 CFR 63 Subpart KK (§63.825). These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

The source shall perform VOC compliance stack tests within one hundred and eighty (180) days of the issuance of this Part 70 Permit renewal on regenerative thermal oxidizer, identified as OXD#6 and on catalytic oxidizing incinerators, identified as OXD#2 and OXD#5 to demonstrate compliance with the PSD minor VOC limit. These tests shall be repeated at least once every 2.5 years from the date of the last valid compliance demonstration. In addition to these requirements IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

Previous stack test to comply with this requirement was conducted as follows:

- (a) VOC emissions testing were performed at Press #1 on July 22, 2004 and found to be in compliance;
- (b) VOC emissions testing were performed at Press #2 on July 22, 2004 and found to be in compliance;
- (c) VOC emissions testing were performed at Press #3 on October 12 through October 13, 2004 and found to be in compliance and
- (d) VOC emissions testing were performed at Press #4 on October 12 through October 13, 2004 and found to be in compliance.

Compliance Requirements

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

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

1. The four (4) packaging rotogravure printing presses have applicable compliance monitoring conditions as specified below:
 - (a) Pursuant to 326 IAC 8-1-10(a), this rule applies to any source that uses compliant coatings 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). The source also proposes to use water based compliant coatings in some of its operations to meet the requirements of 326 IAC 8-5-5, therefore, the requirements of 326 IAC 8-1-10 apply to this source when using the water based coatings.

- (b) 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). 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 devices.
- (c) Pursuant to 326 IAC 8-1-12(b), by May 1, 1997, the owner or operator of the coating facility using a control device to comply with a VOC emission limit, 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 thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator 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.

- (B) If a catalytic incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of in the gas stream immediately before and after the catalyst bed of the incinerator 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) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.
- (d) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 - #4 (emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-8) shall be limited to 3,458 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall control efficiency of 94.20%. This will limit the potential to emit VOC from Presses #1 - #4 (P1U1-10, P2U1-9, P3U1-8, and P4U1-8) to 200.54 tons per twelve (12) consecutive month period.

The Permittee shall record monthly the amount of VOC used at each press and shall submit quarterly reports to OAQ Compliance Section.

These monitoring conditions are necessary because the thermal incinerator and the catalytic incinerator for the printing operations must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

- 2. The thermal oxidizer shall have applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the one (1) thermal oxidizer, identified as OXD#6 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 the thermal oxidizer is below 1500°F. A 3-hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.2, as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is 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.

These monitoring conditions are necessary because the thermal oxidizer for the printing operations must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

- 3. The Catalytic Incinerator shall have applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic incinerators, identified as OXD#2 and OXD#5 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 600°F. A 3-hour average temperature that is below 600°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.2, as approved by IDEM.
 - (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - 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.

These monitoring conditions are necessary because the catalytic incinerator for the printing operations must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this existing stationary packaging rotogravure printing operation shall be subject to the conditions of this Part 70 permit renewal T143-21426-00007.

Appendix A: Emission Calculations
VOC From Printing Press Operations
Company Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Title V: T143-21426-00007
Reviewer: KSR/EVP
Date: 10/14/2005

Potential Uncontrolled VOC Emissions:

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
Press #1	740	12	39.4	60	8,760	1,000,000	183,893
Press #2	740	12	39.4	60	8,760	1,000,000	183,893
Press #3	700	12	39.4	60	8,760	1,000,000	173,953
Press #4	800	12	40.0	60	8,760	1,000,000	201,830

PRINTING VOC:

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	Control Equipment ID	Capture Efficiency	Destruction Efficiency	Controlled VOC Pounds per Hour	Controlled VOC Tons per Year	VOC Input Limit as % of potential input	Limited/Controlled VOC Tons per Year	Total Limited VOC input Tons per Year
Press #1 - Adcote Adhesive	10.9	77.19%	100%	183,893	2,000	176.62	773.61	OXD#6	100.00%	94.20%	10.24	44.87	29.44%	13.21	227.75
Press #1 - Minute Maid Yellow Ink	8.5	75.32%	100%	183,893	2,000	134.40	588.66	OXD#6	100.00%	94.20%	7.80	34.14	29.44%	10.05	173.30
Press #1 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	183,893	2,000	120.16	526.29	OXD#6	100.00%	94.20%	6.97	30.52	29.44%	8.99	154.94
Press #2 - Adcote Adhesive	10.9	77.19%	100%	183,893	2,000	176.62	773.61	OXD#6	100.00%	94.20%	10.24	44.87	29.44%	13.21	227.75
Press #2 - Minute Maid Yellow Ink	8.5	75.32%	100%	183,893	2,000	134.40	588.66	OXD#6	100.00%	94.20%	7.80	34.14	29.44%	10.05	173.30
Press #2 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	183,893	2,000	120.16	526.29	OXD#6	100.00%	94.20%	6.97	30.52	29.44%	8.99	154.94
Press #3 - Adcote Adhesive	10.80	77.19%	100%	173,953	2,000	165.54	725.08	OXD#2	100.00%	94.20%	9.60	42.05	29.44%	12.38	213.46
Press #3 - Minute Maid Yellow Ink	8.5	75.32%	100%	173,953	2,000	127.13	556.84	OXD#2	100.00%	94.20%	7.37	32.30	29.44%	9.51	163.93
Press #3 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	173,953	2,000	113.66	497.84	OXD#2	100.00%	94.20%	6.59	28.87	29.44%	8.50	146.57
Press #4 - Adhesive	24.4	79.00%	100%	201,830	2,000	443.39	1942.05	OXD#5	100.00%	94.20%	25.72	112.64	29.44%	33.16	571.74
Press #4 - Ink/Varnish	55.4	76.00%	100%	201,830	2,000	969.38	4245.87	OXD#5	100.00%	94.20%	56.22	246.26	29.44%	72.50	1249.98
Total Potential Uncontrolled Emissions:							2,681.46					681.20		200.54	3,457.67

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 # 1 has a maximum line speed of 840 ft/min (printing only) or 740 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 740 ft/min of printing and adhesive.
 Press # 2 has a maximum line speed of 840 ft/min (printing only) or 740 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 740 ft/min of printing and adhesive.
 Press # 3 has a maximum line speed of 800 ft/min (printing only) or 700 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 700 ft/min of printing and adhesive.
 Press # 4 has a maximum line speed of 800 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 800 ft/min of printing and adhesive.
 Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%.
 There are negligible emissions from clean-up operations.

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
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
 Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency)) * VOC Input Limitation (%)

Appendix A: Emission Calculations

HAPS From Printing Press Operations

Company Name: Multi-Color Corporation

Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170

Title V: T143-21426-00007

Reviewer: KSR/EVP

Date: 10/14/2005

Potential Uncontrolled HAP Emissions:

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
Press #1	740	12	39.4	60	8,760	1,000,000	183,893
Press #2	740	12	39.4	60	8,760	1,000,000	183,893
Press #3	700	12	39.4	60	8,760	1,000,000	173,953
Press #4	800	12	40.0	60	8,760	1,000,000	201,830

PRINTING VOC:

Ink Name	Maximum Coverage lbs/ MMin ²	Weight % Toluene As Applied	Flash Off %	Potential Throughput MMin ² /Year	Tons/ 2,000 lbs	Potential Toluene Pounds per Hour	Potential Toluene Tons per Year	Control Equipment ID	Capture Efficiency	Destruction Efficiency	Controlled Toluene Pounds per Hour	Controlled Toluene Tons per Year	Toluene Input Limit as % of potential input	Limited/Controlled Toluene Tons per Year	Total Limited Toluene input Tons per Year
Press #1 - Adcote Adhesive	10.9	67.80%	100%	183,893	2,000	155.14	679.50	OXD#6	100.00%	94.20%	9.00	39.41	29.44%	11.60	200.05
Press #1 - House Black Ink	8.5	10.90%	100%	183,893	2,000	19.45	85.19	OXD#6	100.00%	94.20%	1.13	4.94	29.44%	1.45	25.08
Press #2 - Adcote Adhesive	10.9	67.80%	100%	183,893	2,000	155.14	679.50	OXD#6	100.00%	94.20%	9.00	39.41	29.44%	11.60	200.05
Press #2 - House Black Ink	8.5	10.90%	100%	183,893	2,000	19.45	85.19	OXD#6	100.00%	94.20%	1.13	4.94	29.44%	1.45	25.08
Press #3 - Adcote Adhesive	10.80	67.80%	100%	173,953	2,000	145.41	636.88	OXD#2	100.00%	94.20%	8.43	36.94	29.44%	10.87	187.50
Press #3 - House Black Ink	8.5	10.90%	100%	173,953	2,000	18.40	80.58	OXD#2	100.00%	94.20%	1.07	4.67	29.44%	1.38	23.72
Press #4 - Adhesive	24.4	67.80%	100%	201,830	2,000	380.53	1666.72	OXD#5	100.00%	94.20%	22.07	96.67	29.44%	28.46	490.68
Press #4 - House Black Ink	55.4	10.90%	100%	201,830	2,000	139.03	608.95	OXD#5	100.00%	94.20%	8.06	35.32	29.44%	10.40	179.27
Total Potential Uncontrolled Emissions:						1,032.54	4,522.51					262.31		77.22	1,331.43

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 # 1 has a maximum line speed of 840 ft/min (printing only) or 740 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 740 ft/min of printing and adhesive.
 Press # 2 has a maximum line speed of 840 ft/min (printing only) or 740 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 740 ft/min of printing and adhesive.
 Press # 3 has a maximum line speed of 800 ft/min (printing only) or 700 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 700 ft/min of printing and adhesive.
 Press # 4 has a maximum line speed of 800 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 800 ft/min of printing and adhesive.
 Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%
 There are negligible emissions from clean-up operations.

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
 Toluene = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
 Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency)) * Toluene Input Limitation (%)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Multi- Color Corporation
 Address City IN Zip: 2281S US 31, Scottsburg, Indiana 47170
 Permit Number: 143-21426-00007
 Pit ID: 143-00007
 Reviewer: KSR/EVP
 Date: 10/14/2005

Source	Number of Furnaces	mmbtu/hr Rating	Annual Hours of Operation	Annual Natural Gas (mmcf/yr)	PM/PM10	SO2	NOx	CO	VOC	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Nickel
					ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr
Press # 1 Dryer	1	7.76	8760	67.98	0.26	0.02	3.40	2.86	0.19	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00
Press # 2 Dryer	1	7.76	8760	67.98	0.26	0.02	3.40	2.86	0.19	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00
Press # 3 Boiler	1	6	8760	52.56	0.20	0.02	2.63	2.21	0.14	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.00
Press # 4 Dryer	1	5	8760	43.80	0.17	0.01	2.19	1.84	0.12	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00
OXD # 2	1	4	8760	35.04	0.13	0.01	1.75	1.47	0.10	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00
OXD # 5	1	5.8	8760	50.81	0.19	0.02	2.54	2.13	0.14	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.00
OXD # 6	1	204	8760	1787.04	6.79	0.54	169.77	75.06	4.91	0.00	0.00	0.07	1.61	0.00	0.00	0.00	0.00
Combustion Totals, Tons/Year					8.00	0.63	185.68	88.42	5.79	0.00	0.00	0.08	1.89	0.00	0.00	0.00	0.00

Note: Assume that the heating value of natural gas is 1000 Btu / Cubic Foot.

	Natural Gas Emission Factors		
	Rated Capacity, MMBtu/hr		
	0 - 0.3	0.3 - 100	> 100
Units	lb/mmcf		
PM/PM10	7.60	7.60	7.60
SO2	0.60	0.60	0.60
NOx	94.00	100.00	190.00
CO	40.00	84.00	84.00
VOC	5.50	5.50	5.50
Source	AP-42, Chapter 1.4		

$$\text{Sample Calculation} \quad \frac{\text{MMCF}}{\text{YR}} \times \frac{\text{LB}}{\text{MMCF}} \times \frac{\text{TONS}}{\text{LB}} = \frac{\text{TONS}}{\text{YR}}$$

HAPs	Natural Gas Emission Factors in lb/MMcf
Benzene	0.0021
Dichlorobenzene	0.0012
Formaldehyde	0.075
Hexane	1.8
Toluene	0.0034
Cadmium	0.0011
Chromium	0.0014
Nickel	0.0021
Source	AP-42, Chapter 1.4

Appendix A: Emissions Calculations

Degreasing Operation

Company Name: Multi- Color Corporation
Address City IN Zip: 2281S US 31, Scottsburg, Indiana 47170
Permit Number: 143-21426-00007
Plt ID: 143-00007
Reviewer: KSR/EVP
Date: 10/14/2005

Pollutant	Maximum rate	Emission Factor	Emission Rate	Maximum Uncontrolled Emissions	Pollution Control Efficiency	Maximum Controlled Emissions
	units/hr	lb/units	lb/hr	tons/yr	%	tons/yr
PM	N/A					
PM10	N/A					
SO2	N/A					
NOx	N/A					
VOC	1 cycle	18.9	18.9	82.8	N / A	28.45*
CO	N/A					
Lead	N/A					

Source of Emission Factors : Estimated material usage.

* Proposed permit emission limit is 28.45 tons/year.(Refer Permit No. 143-18145-00007)

Insignificant Degreasing Operation:

Emission Unit	VOC Emission Factor*	Total Amount of Degreaser	VOC Emissions
		Consumed in a Year	
	lbs/gallon	Gallons	Tons/Year
Part Washer	8.42	218.81	0.92

Note:

* This Emission Factor is based on the worst case of the Degreaser used.

Methodology:

$$\text{VOC Emission (Tons/Year)} = (\text{VOC Emission Factor (lbs/gallon)} * \text{Total Amount of Degreaser Consumed in a year (Gallons/year)})/2000$$

Appendix A: Emissions Calculations

VOC From Electron Beam Cured Printing Press Line

Company Name: Multi- Color Corporation
 Address City IN Zip: 2281S US 31, Scottsburg, Indiana 47170
 Permit Number: 143-21426-00007
 Pit ID: 143-00007
 Reviewer: KSR/EVP
 Date: 10/14/2005

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
EB Coater	1000	42	264902

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
	4.74	1%	100.00%	264902	6.28

Total VOC Emissions =	6.28	Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

Seaming Machine

Company Name: Multi- Color Corporation

Address City IN Zip: 2281S US 31, Scottsburg, Indiana 47170

Permit Number: 143-21426-00007

Pit ID: 143-00007

Reviewer: KSR/EVP

Date: 10/14/2005

Speed	Maximum Application Rate			
meter/minute	lbs/1,000,000 m	lbs/mins	lbs/day	tons of VOC/year
140	31	0.00434	6.2496	1.14
500	31	0.0155	22.32	4.07
			Total	5.21

Appendix A: Emissions Calculations**Insignificant Activities**

Company Name: Multi- Color Corporation
Address City IN Zip: 2281S US 31, Scottsburg, Indiana 47170
Permit Number: 143-21426-00007
Plt ID: 143-00007
Reviewer: KSR/EVP
Date: 10/14/2005

Source	PM/PM10 ton/yr	SO2 ton/yr	NOx ton/yr	CO ton/yr	VOC ton/yr
Press # 3 Boiler	0.20	0.02	2.63	2.21	0.14
Isopropyl acetate Storage Tanks	-	-	-	-	0.141
Ink dispensing system	-	-	-	-	2
Degreasing Operation					0.92
Electron Beam Curing Unit	-	-	-	-	6.28
Seaming Machine	-	-	-	-	5.21
Total	0.20	0.02	2.63	2.21	14.69

Appendix A: Emission Calculations

Company Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Title V: T143-21426-00007
Reviewer: KSR/EVP
Date: 10/14/2005

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Presses #1 - #4	Solvent Degreasing PW2	Insignificant Activities	TOTAL
PM	7.80	0.00	0.00	0.00	7.8
PM10	7.80	0.00	0.00	0.00	7.8
SO2	0.61	0.00	0.00	0.00	0.6
NOx	183.05	0.00	0.00	0.00	183.1
VOC	5.65	3,458.00	82.80	13.77	3,560.2
CO	86.21	0.00	0.00	0.00	86.2
total HAPs	1.97	1,331.43	0.00	0.00	1,333.4
worst case single HAP	Hexane: 1.89	Toluene: 1331.43	0.00	0.00	1,331.4
Total emissions based on rated capacity at 8,760 hours/year.					

Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Presses #1 - #4 (Solvent based application)	Solvent Degreasing PW2	Insignificant Activities	TOTAL
PM	7.80	0.00	0.00	0.00	7.8
PM10	7.80	0.00	0.00	0.00	7.8
SO2	0.61	0.00	0.00	0.00	0.6
NOx	183.05	0.00	0.00	0.00	183.1
VOC	5.65	200.54	28.45	13.77	248.4
CO	86.21	0.00	0.00	0.00	86.2
total HAPs	1.97	77.22	0.00	0.00	79.2
worst case single HAP	Hexane: 1.89	Toluene: 77.22	0.00	0.00	79.11

Total emissions based on rated capacity at 8,760 hours/year, after controls and/or input limitations.

- (a) Uncontrolled potential VOC emissions for solvent based application at Press #1,#2,#3,#4 are based on information from previous permits. The Permittee stated that the total input VOC shall not exceed 3,458 tons per year. Controlled potential VOC emissions for solvent based application at Press #1,#2,#3,#4 based on 94.20% control efficiency of the oxidizers. The control efficiency is based on the latest stack test results.
- (b) Uncontrolled potential Toluene emissions for solvent based application at Press #1,#2,#3,#4 are based on the information on Permit No. 143-9310-00007. Controlled potential Toluene emissions for solvent based application at Press #1,#2,#3,#4 based on 94.20% control efficiency of the oxidizers.
- (c) Uncontrolled potential VOC emissions for the solvent degreasing operation based on the information on Permit No. 143-18145-00007. Controlled potential VOC emission for the solvent degreasing operations based on input VOC limits exhausted uncontrolled to the atmosphere.