



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: September 14, 2005
RE: Printpack, Inc / 105-21593-00018
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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

September 14, 2005

Mr. Todd Foster
Printpack, Inc.
303 N. Curry Pike
Bloomington, IN 47404

Re: **105-21593-00018**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 105-10511-00018**

Dear Mr. Foster:

Printpack, Inc. was issued Part 70 Operating Permit **T 105-10511-00018** on April 25, 2000, for a flexographic printing source. An application to modify the source was received on July 27, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) photopolymer plate making system, identified as PH01, exhausting through Stack 005, maximum plate throughput: 52.5 square feet of plates per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395, ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments (Minor Source Modification and Technical Support Document)

CAP/MES

cc: File - Monroe County
Monroe County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Mr. Dan Acus, Printpack, Inc.



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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Printpack, Inc.
 303 N. Curry Pike
 Bloomington, Indiana 47404**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T 105-10511-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 25, 2000 Expiration Date: April 25, 2005

First Minor Source Modification No.:105-21593-00018	Affected Conditions: A.1 and A.2; All of Section D.4 and one (1) Quarterly Report Form has been added
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: September 14, 2005

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

The Permittee owns and operates a stationary flexographic printing source.

Responsible Official: Plant Manager
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Phone Number: 812 - 339 - 9294
SIC Code: 2759
County Location: Monroe
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Minor 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) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.
- (e) One (1) photopolymer plate making system, identified as PH01, exhausting through Stack 005, maximum plate throughput: 52.5 square feet of plates per hour.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (e) One (1) photopolymer plate making system, identified as PH01, exhausting through Stack 005, maximum plate throughput: 52.5 square feet of plates per hour.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(4)(A)] [326 IAC 2-2]

The VOC usage at the one (1) photopolymer plate making system, identified as PH01, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than 25 tons per year. Therefore, the addition of this photopolymer plate making system is a minor modification pursuant to 326 IAC 2-7-10.5 and 326 IAC 2-2 and the requirements of 326 IAC 2-2 are not applicable.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (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.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) photopolymer plate making system.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each solvent used.

- (2) The amount of solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: 105-10511-00018
Facility: One (1) photopolymer plate making system, identified as PH01
Parameter: VOC usage
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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

Technical Support Document (TSD) for Part 70 Minor Source and Minor Permit Modifications

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	303 N. Curry Pike, Bloomington, Indiana 47404
County:	Monroe
SIC Code:	2759
Operation Permit No.:	T 105-10511-00018
Operation Permit Issuance Date:	April 25, 2000
Minor Source Modification No.:	105-21593-00018
Minor Permit Modification No.:	105-21623-00018
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a modification application from Printpack, Inc. relating to the construction and operation of the following emission unit:

One (1) photopolymer plate making system, identified as PH01, exhausting through stack 005, maximum plate throughput: 52.5 square feet of plates per hour.

In addition to this proposed facility, the Responsible Official has been updated in the permit.

History

On July 27, 2005, Printpack, Inc. submitted an application to the OAQ requesting to add a photopolymer plate making system to their existing plant. This is not a coating process. The plate is exposed to UV light. After exposure, the plate is placed in a washout unit where the solution and brushes remove uncured polymer from the plate, leaving the image areas. The plate is then rinsed, dried, finished, and exposed to UV light again. Emissions from the photopolymer plate making system are VOC emissions from plate washout, rinsing and drying, all performed by the processor unit.

Printpack, Inc. was issued a Part 70 permit on April 25, 2000. An Administrative Amendment (105-14579-00018) was issued on August 21, 2001, a Reopening (105-13426-00018) was issued on February 7, 2002, a first Significant Permit Modification (105-15751-00018) was issued November 20, 2002, and a second Significant Permit Modification (105-16875-00018) was issued on June 1, 2005.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Stack 005	Photopolymer plate making system (PH01)	35.0	0.833	2,000	110

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source and Permit Modifications be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 27, 2005.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

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

This table reflects the PTE before controls for this modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	40.8
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Individual	-
TOTAL	-

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source and Permit Modification. This Minor Source Modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(A), modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants, ten (10) tons per year of any single hazardous air pollutant as defined under Section 112(b) of the CAA, or twenty-five (25) tons per year of any combination of hazardous air pollutants by limiting total annual solvent usage or maximum volatile

organic compound content, or both. This Minor Permit Modification is being performed pursuant to 326 IAC 2-7-12(b)(1).

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) 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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Monroe County has been classified as unclassifiable or attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.
- (c) Monroe County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	14.6
PM ₁₀	14.6
SO ₂	0.250
VOC	500
CO	2.50
NO _x	3.00

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the combination of the limitations in the Part 70 Operating Permit for all existing significant emission units and the Technical Support Document for T 105-10511-00018, issued on April 25, 2000, for insignificant activities.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Proposed Modification	-	-	-	< 25.0	-	-
PSD Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The limitations that make this modification a minor modification pursuant to 326 IAC 2-7-10.5(d), will also make this modification a minor modification pursuant to 326 IAC 2-2, PSD.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 20 and 40 CFR Part 61 and 63) included in the permit for this proposed modification.
- (c) The one (1) proposed photopolymer plate making system does not use any halogenated solvents. Therefore, the requirements of 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not included in the permit for this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-7-10.5 (Part 70 Source Modification)

The proposed photopolymer plate making system has a potential to emit more than twenty-five (25) tons per year of VOC. The applicant has agreed to limit the total VOC usage in the photopolymer plate making system to less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, in order to make this a minor modification pursuant to 326 IAC 2-7-10.5. Therefore, the potential to emit VOC is limited to less than 25 tons per year, and this is a minor source modification pursuant to 326 IAC 2-7-10.5(d)(4)(A).

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

This source is an existing PSD major source and the unrestricted potential VOC emissions from the proposed plate making system are greater than forty (40) tons per year. The limit making this modification minor pursuant to 326 IAC 2-7-10.5 will also limit the VOC emissions to less than 40 tons per year. Therefore, this modification is a minor modification pursuant to 326 IAC 2-2, and the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-4.1 (New Source Toxic Control)

There are no HAP emissions from the proposed photopolymer plate making system. Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are still not applicable.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The proposed facility is regulated by 326 IAC 8-3-2. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

Pursuant to 326 IAC 1-2-18.5, "Cold cleaner degreaser" means a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article. Since solvent is used to clean the plates, this unit is considered a cold cleaner degreaser. This is a new facility constructed after January 1, 1980. Therefore, the photopolymer plate making system is subject to the requirements of 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, The Permittee shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements; and
- (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)

This facility, constructed after July 1, 1990, does have a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-5 are not applicable.

Compliance Requirements

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

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

There are no compliance monitoring requirements specifically applicable to the photopolymer plate making system.

Testing Requirements

There is no testing proposed at this time.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

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

The Permittee owns and operates a stationary flexographic printing source.

Responsible Official: ~~Mr. Gary Whiteside~~ **Plant Manager**
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Phone Number: 812 - 339 - 9294
SIC Code: 2759
County Location: Monroe
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Minor 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) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994,

equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.

- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.
- (e) **One (1) photopolymer plate making system, identified as PH01, exhausting through Stack 005, maximum plate throughput: 52.5 square feet of plates per hour.**

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (e) **One (1) photopolymer plate making system, identified as PH01, exhausting through Stack 005, maximum plate throughput: 52.5 square feet of plates per hour.**

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(4)(A)] [326 IAC 2-2]

The VOC usage at the one (1) photopolymer plate making system, identified as PH01, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than 25 tons per year. Therefore, the addition of this photopolymer plate making system is a minor modification pursuant to 326 IAC 2-7-10.5 and 326 IAC 2-2 and the requirements of 326 IAC 2-2 are not applicable.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) photopolymer plate making system.

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

D.4.4 Record Keeping Requirements

- (a) **To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
 - (1) **The VOC content of each solvent used.**
 - (2) **The amount of solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (3) **The total VOC usage for each month; and**
 - (4) **The weight of VOCs emitted for each compliance period.**
- (b) **To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: T 105-10511-00018
Facility: One (1) photopolymer plate making system, identified as PH01
Parameter: VOC usage
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 105-21593-00018 and Part 70 Minor Permit Modification No. 105-21623-00018.

**Appendix A: Emissions Calculations
VOC and Particulate
From Photopolymer Plate Making**

Company Name: Printpack, Inc.
Address City IN Zip: 303 N. Curry Pike, Bloomington, IN 47404
Minor Source Modification Number: 105-21593
Minor Permit Modification Number: 105-21623
Plt ID: 105-00018
Reviewer: CarrieAnn Paukowits
Application Date: July 27, 2005

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. Used (gal/sq ft)*	Maximum (sq ft/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Optisol washout/rinse**	7.1	100.000%	0.0%	100.0%	0.0%	0.00%	0.02500	52.500	7.09	7.09	9.31	223	40.8	0.00	n/a	100%

*Gallons of material used is 0.25 x the percent not recycled (10%). The percent recycled was provided by the manufacturer.

PM Control Efficiency:

0.00%

**There are no HAPs in this material.

Uncontrolled	9.31	223	40.8	0.00
Controlled	9.31	223	40.8	0.00

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used