

TO: Interested Parties / Applicant  
RE: Bemis Company, Inc. / SPM 167-21603-00033  
FROM: George M. Needham  
Director  
Vigo County Air Pollution Control

## **Notice of Decision: Approval – Effective Immediately**

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

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

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was 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 Vigo County Air Pollution Control at (812) 462-3433.

Enclosures

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

**Bemis Company, Inc.  
1350 North Fruitridge Ave.  
Terre Haute, Indiana 47805**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T167-6182-00033	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004  Expiration Date: June 28, 2009
First Significant Source Modification No.: 167-19667-00033	Issued May 2, 2005
First Significant Permit Modification No.: 167-19669-00033	Pages Affected: 3 - 9, 29 - 50 Renumbered from 64 pages to 67 pages Issued June 20, 2005
Second Significant Source Modification No.: 167-21605-00033	Issued January 5, 2006
Second Significant Permit Modification No.: 167-21603-00033	Pages Affected: 4-5, 8, 30-31, 36, 43, 45, 49-52 (added), 53, 55, 71 (added) Renumbered from 67 pages to 76 pages
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: January 20, 2006  Expiration Date: June 28, 2009

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary polyethylene film plant including film production, printing, and converting operations.

Responsible Official:	Plant Manager
Source Address:	1350 North Fruitridge Ave., Terre Haute, Indiana 47805
Mailing Address:	PO Box 905, Terre Haute, Indiana 47808
General Source Phone Number:	(812) 466-2213
SIC Code:	2673, 3081, and 3079
County Location:	Vigo County
Source Location Status:	Maintenance Attainment for Sulfur Dioxide (SO <sub>2</sub> ) Attainment for all other criteria pollutants Nonattainment for ozone under the 8-hour standard
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, under Emission Offset Not 1 of 28 Source Categories

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

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

- (1) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (9) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

- (10) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (11) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (12) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (13) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (14) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (15) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (16) Flexographic printing press, identified as press #19, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (17) Flexographic printing press, identified as press #20, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (18) Flexographic printing press, identified as press #21, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (19) Flexographic printing press, identified as press #22, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (20) Flexographic printing press, identified as press #23, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (21) Flexographic printing press, identified as press #24, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (22) Flexographic printing press, identified as press #25, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (23) Flexographic printing press, identified as press #27, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (24) Flexographic printing press, identified as press #28, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (25) Flexographic printing press, identified as press #29, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (26) Flexographic printing press, identified as press #30, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (27) Flexographic printing press, identified as Press 31, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (28) Flexographic printing press, identified as Press 32, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (29) Flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to

- stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (30) Flexographic printing press, identified as Press 34, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
  - (31) Flexographic printing press, identified as Press 35, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
  - (32) Flexographic in-line printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
  - (33) Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
  - (34) Flexographic printing press, identified as press #37, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
  - (35) Flexographic printing press, identified as press #38, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
  - (36) Closed Solvent Spray type parts washer exhausting to stack 20.
  - (37) Cyrel plate making facility exhausting to stack 23.
  - (38) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.  
(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)
  - (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
  - (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
  - (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
  - (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
  - (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
  - (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
  - (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.

- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.
- (47) Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (48) Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (49) Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (50) Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (51) Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (52) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (53) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (54) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (55) Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (56) Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (57) Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (58) Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.
- (59) Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (60) Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (61) Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (62) Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (63) Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (64) Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (65) Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (66) Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to

stack 248.

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

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

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

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

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

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

## **SECTION B GENERAL CONDITIONS**

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

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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]**

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

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

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

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

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

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

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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)]**

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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 and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ and VCAPC, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- 
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.

- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year, with submittal of the certification due by July 1 of the following year. Certifications for all subsequent years shall cover the time period from January 1 to December 31, with submittal of the certification due by July 1 of the following year to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
  
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

**IDEM**

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

**VCAPC**

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the

“responsible official” as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and VCAPC, telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.  
  
This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ or VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ or VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ or VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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]**

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (2) If IDEM, OAQ and VCAPC, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ and VCAPC, take final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and VCAPC, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ and VCAPC, fail to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
And  
  
Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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- (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]**

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, VCAPC, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5][IC 13-17-3-2]

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

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

- (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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

B.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 Opacity [326 IAC 5-1]

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

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

#### C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

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

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(C) Waste disposal site.

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

All required notifications shall be submitted to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

**C.7 Performance Testing [326 IAC 3-6]**

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

##### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

The notification which shall be submitted by the Permittee does require the certification by the "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.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( " 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of any other operating parameter, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( " 2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

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

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

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

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

C.13 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.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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

The statement must be submitted to:

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

and

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

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

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

C.17 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 or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

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

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

There are no specific applicable requirements for these emission units.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (10) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (11) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (12) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (13) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (14) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (15) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (38) Four (4) Catalytic Oxidizers identified as I1 through I4 and exhausting through Stacks S1 through S4, each with a maximum heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr) are interconnected to form an oxidation control system capable of controlling emissions from Presses #11 through #18.  
(Note: Each individual oxidizer is only capable of handling air flow from two of the eight presses at a time.)

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

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

#### D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2]

- (a) Pursuant to Construction Permit PC-84-1669, issued on November 25, 1987, and revised through this Part 70 permit, the following conditions apply:
  - (1) The annual VOC input to Press #13, Press #14, Press #15, and Press #16 combined shall be limited such that the potential to emit does not exceed 94 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 94 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
  - (2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #13, Press #14, Press #15, and Press #16.
- (b) Pursuant to Construction Permit PC-84-1842, issued on April 6, 1990, and revised through this Part 70 permit, the following conditions apply:
  - (1) The annual VOC input to Press #17 and Press #18 shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.9 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
  - (2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #17 and Press #18.

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #17 and #18) with regard to 326 IAC 2-2 (PSD).

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

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- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the six (6) printing presses (Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) shall maintain a minimum destruction efficiency of 90%.

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

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

**Compliance Determination Requirements**

**D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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- \*(a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #13, Press #14, Press #15, Press #16, Press #17, and Press #18) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

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- (a) Compliance with the VOC limitations contained in Condition D.2.1 shall be determined by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 1, Unit 2, Unit 3, and Unit 4) to achieve compliance with conditions D.2.1 and D.2.2.

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

**D.2.6 Catalytic Oxidizer Requirements**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 1, Unit 2, Unit 3, and Unit 4) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.2.1. and D.2.2, as approved by IDEM and VCAPC.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate

response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

#### D.2.7 Oxidizer Ganging

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Oxidizer Unit 1, Unit 2, Unit 3, and Unit 4, are each designed to handle 7250 acfm of solvent laden air. These oxidizers are considered to be combined with the following restrictions:

- (a) Before any of the affected presses (Presses #13 through #18) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #13 through #18 are each rated at 3500 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.
- (c) In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- (d) In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es). Any press shut down in this fashion can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.
- (e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

#### D.2.8 Monitoring

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- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the six (6) printing presses (Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the four (4) catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

#### D.2.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent, used for each press monthly.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in conditions D.2.1 and D.2.5.
- (b) To document compliance with Condition D.2.6 and Condition D.2.7, records of each press and each oxidizer operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the minimum three (3) hour average temperature, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to oxidizer related problems.
  - (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.10 Reporting Requirements

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

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (16) Flexographic printing press, identified as press #19, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (17) Flexographic printing press, identified as press #20, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (18) Flexographic printing press, identified as press #21, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (19) Flexographic printing press, identified as press #22, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (20) Flexographic printing press, identified as press #23, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (21) Flexographic printing press, identified as press #24, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (22) Flexographic printing press, identified as press #25, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (23) Flexographic printing press, identified as press #27, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (24) Flexographic printing press, identified as press #28, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (25) Flexographic printing press, identified as press #29, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (26) Flexographic printing press, identified as press #30, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (27) Flexographic printing press, identified as Press 31, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (28) Flexographic printing press, identified as Press 32, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (29) Flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (30) Flexographic printing press, identified as Press 34, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (31) Flexographic printing press, identified as Press 35, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

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- (33) Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (39) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 5.
- (40) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 6.
- (41) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 7.
- (42) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 8.
- (43) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 9.
- (44) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 10.
- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 12.

(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 VOC Emissions [326 IAC 2-2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM and VCAPC have information that indicates that these emission units (Press #23, Press #24, and Press #25) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Press #23, Press #24, and Press #25) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 2-2]

- (a) Pursuant to Construction Permit CP-84-1896, issued on November 10, 1990, and revised through this Part 70 permit, the following conditions apply:
  - (1) The annual VOC input to Press #19 and Press #20 combined shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) \* (1 - overall control efficiency) # 39.9 tons. Therefore the requirements of 326 IAC 2-2

- (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #19 and Press #20, and
- (b) Pursuant to Construction Permit CP-167-2146, issued October 22, 1991, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #21 and Press #22 combined shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.9 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #21 and Press #22.
- (c) Pursuant to Construction Permit CP-167-3392-00033, issued on April 11, 1994, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #23, Press #24, and Press #25 combined shall be limited such that the potential to emit does not exceed 74.1 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 74.1 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #23, Press #24 and Press #25.
- (d) Pursuant to Construction Permit CP-167-V014-00033, issued on May 30, 1997, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #27, Press #28, Press #29, and Press #30 combined shall be limited such that the potential to emit does not exceed 38.8 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 38.8 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #27, Press #28, Press #29 and Press #30.
- (e) Pursuant to Significant Source Modification 167-11568-00033, issued on February 1, 2000, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #31 and Press #32 combined shall be limited such that the potential to emit does not exceed 19.32 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 19.32 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #31 and Press #32.
- (f) Pursuant to SSM 167-12790-00033, issued on January 23, 2001, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #34 and Press #35 combined shall be limited such that the potential to emit does not exceed 16.85 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 16.85 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #34 and Press #35.

- (g) Pursuant to SSM 167-16521-00033, issued on April 10, 2003, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #33 shall be limited such that the potential to emit does not exceed 9.72 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 9.72 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
  - (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #33.
- (h) Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.99 \text{ tons}$ . Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
  - (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #36.

#### D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

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- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the eight (8) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, and Press #36), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the nine (9) printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34 and Press #35), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the eight (8) catalytic oxidizers (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11, and Unit 12) shall maintain a minimum destruction efficiency of 90%.

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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- (a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, and Press #25) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, and Press #35) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

- (c) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on Press #36 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (d) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 5 and Unit 6) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (e) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 7 and Unit 8) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (f) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 9, Unit 10, Unit 11 and Unit 12) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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- (a) Compliance with the VOC limitations contained in Conditions D.3.2 shall be determined by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11 and Unit 12) to achieve compliance with conditions D.3.2 and D.3.3.

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

#### D.3.7 Catalytic Oxidizer Requirements

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- (a) The Permittee shall monitor Unit 5, Unit 6, Unit 9, and Unit 10 according to the following:
  - (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 5 and Unit 6) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed

during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

- (b) The Permittee shall monitor Unit 7 and Unit 8 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 7 and Unit 8) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 650°F. A three (3) hour average temperature that is below 650°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (c) The Permittee shall monitor Unit 11 and Unit 12 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 9, Unit 10, Unit 11 and Unit 12) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 500°F. A three (3) hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

### D.3.8 Oxidizer Ganging

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Oxidizers Unit 9, Unit 10, Unit 11 and Unit 12, are each designed to handle 12, 750 acfm of solvent laden air. Oxidizers Unit 5, Unit 6, Unit 7 and Unit 8 are each designed to handle 8,500 acfm. These oxidizers are considered to be combined with the following restrictions:

- (a) Before any of the affected presses (Presses #19 through #25 and #27 through #36) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #19 through #25 are each rated at 4250 acfm. Presses #27 through #35 are each rated at 6375 acfm. Press #36 is rated at 4000 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.
- (c) In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- (d) In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es). Any press shut down in this fashion can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.
- (e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

### D.3.9 Monitoring

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- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the sixteen (16) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, Press #35, and Press #36). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11, and Unit 12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

### D.3.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent, used for each press.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in conditions D.3.2 and D.3.6.

- (b) To document compliance with Condition D.3.7 and Condition D.3.8, records of each press and each oxidizer operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the minimum three (3) hour average temperature, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to oxidizer related problems.
- (c) To document compliance with Condition D.3.9, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "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)]:

- (32) Flexographic in-line portable printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
- (47) Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (48) Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (49) Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (50) Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (51) Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (52) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (53) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (54) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (55) Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (56) Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (57) Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (58) Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.

(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) use [326 IAC 2-2][326 IAC 8-5-5]

- (a) The VOC delivered to in-line presses E5, E15, E17, E18, E19, E20, E22, E23, and E31 shall individually not exceed 25 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This condition results in these presses not being subject to the provisions of 326 IAC 8-5-5 (Graphic Arts Operations).
- (b) Pursuant to SSM 167-11853-00033, the VOC delivered to in-line Press E11 shall not exceed 18 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This condition results in the requirements of 326 IAC 2-2 (PSD) not being applicable to this press.

**D.4.2 VOC Emissions [326 IAC 2-2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]**

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The IDEM and VCAPC have information that indicates that these emission units (E5, E15, E17, E18, E19, E22, E23, and E31) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (E5, E15, E17, E18, E19, E22, E23, and E31) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

**Compliance Determination Requirements**

**D.4.3 Volatile Organic Compounds (VOC)**

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

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

**D.4.4 Record Keeping Requirements**

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- (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 limits and/or the VOC emission limits established in Condition D.4.1.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent, used for each press monthly.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in condition D.4.3.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.4.5 Reporting Requirements**

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

## FACILITY OPERATION CONDITIONS

### SECTION D.5

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

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

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

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

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

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

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

- (a) Whenever Press #11 or Press #12 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (b) The capture efficiency system for Presses #11 and #12 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
  - (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
  - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
  - (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
  - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
  - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

**Where:**

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

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

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

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

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

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- (a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for flexographic printer identified as Press #11 and Press #12 in conjunction with the catalytic oxidation systems shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks for flexographic printer identified as Presses #11 and #12 the incineration systems shall maintain a minimum of 90% destruction efficiency.

#### D.5.3 Clean Units [326 IAC 2-2.2]

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- (a) Pursuant to 326 IAC 2-2.2, Press #11 and Press #12 are designated as Clean Units for volatile organic compounds (VOC) emissions.
- (b) The Clean Unit designation for Press #11 and Press #12 shall be in effect for ten (10) years from the date this PSD Permit No.: 167-19667-00033 is issued.
- (c) In order to maintain the Clean Unit designation for Press #11 and Press #12:
  - (1) the Permittee shall comply with the PSD BACT limit established for these presses and their VOC control systems found in Condition D.5.1.
  - (2) no physical change or change in the method of operation shall be made for Press #11 and Press #12 that will allow them to be operated in a manner that is inconsistent with their original physical or operational characteristic.
  - (3) the Permittee shall not replace the specific air pollution control technology with one that has a lower control efficiency than the original control that was established as BACT.
- (d) Any project at these presses for which actual construction begins after the effective date and before the expiration date of the clean units designation shall be considered to have occurred while the emissions units were clean units.
- (e) If a project at these emission units does not cause the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT and the project would not alter any physical or operational characteristics that formed the basis for the BACT determination, the clean unit designations remain unchanged.
- (f) If a project causes the need for a change in the emission limitations in this permit for these units that were adopted in conjunction with BACT or the project would alter any physical or operational characteristics that formed the basis for the BACT determination, then the clean unit designations shall expire upon issuance of the necessary permit modifications, unless the units requalify as clean units. If the Permittee begins actual construction on the project without first applying to modify the emissions unit's permit, the clean unit designations shall expire immediately prior to the time when actual construction of this project begins.
- (g) The Emission limits required for Press #11 and Press #12 in conjunction with the PSD BACT shall stay the same upon expiration of the Clean Unit designation.
- (h) A change that causes emission units to lose their clean unit designation shall be subject to the applicability requirements of 326 IAC 2-2-2(d)(1) through 326 IAC 2-2-2(d)(4) and 326 IAC 2-2-2(d)(6).

**D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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Within sixty days (60) after the issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency and the total enclosure as per Condition D.5.1 for the Catalytic Oxidizers utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.5.6 Thermal Oxidizer Temperature**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Part 70 Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of any catalytic oxidizer in the control system used to control emissions from Press #11 and Press #12 Catalytic Oxidizers is below 550 °F. A three (3) hour average temperature that is below 550 °F is not a deviation from this permit. Failure to take response steps in accordance with Part 70 Section C – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

**D.5.7 Parametric Monitoring**

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- (a) The Permittee shall determine the appropriate permanent total enclosure monitoring parameter and value (duct pressure, or fan amperage or differential pressure) from the most recent performance test that demonstrates compliance with limits in Condition D.5.1, as approved by IDEM.
- (b) The established permanent total enclosure monitoring parameter and value (duct pressure, or fan amperage or differential pressure) shall be observed at least once per day when Press #11 and Press #12 Catalytic Oxidizers are in operation. On and after the date the approved compliance demonstration results are available, the permanent total enclosure monitoring parameter shall be maintained within the normal range as established in most recent performance test.

**Compliance Monitoring Requirements**

**D.5.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]**

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Pursuant to 40 CFR Part 64, Presses #11 and #12 are subject to CAM. Since these presses do not have a PTE after controls at major source significant levels, the CAM plan for these presses shall be submitted as part of the Part 70 permit renewal application.

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

### **D.5.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below.
  - (1) The continuous temperature records (reduced to a three-hour average basis) for the Press #11 and Press #12 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (2) Daily record of the duct pressure, or fan amperage or differential pressure.
- (b) To document compliance with Condition D.5.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

## Section D.6

## FACILITY OPERATION CONDITIONS

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

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

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

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

#### D.6.1 Volatile Organic Compounds (VOC) [326 IAC 2-3]

- (a) The input of VOC to Press #37 and Press #38 combined shall be less than 800 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit, in combination with the rest of this condition, is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period.
- (b) Whenever Press #37 or Press #38 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.

- (c) The capture efficiency system for Presses #37 and #38 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
- (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
  - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
  - (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
  - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
  - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

**Where:**

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

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

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

Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

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

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- (a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for the flexographic printers identified as Press #37 and Press #38 in conjunction with the catalytic oxidation systems shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks at the flexographic printers identified as Press #37 and Press #38 the catalytic oxidation systems shall maintain a minimum of ninety percent (90%) destruction efficiency.

**D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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Within sixty (60) days after achieving maximum production rate, but no later than one-hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify compliance with the overall VOC control efficiency (including capture and destruction efficiency) requirement in Condition D.6.1 for the Catalytic Oxidizers utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.6.5 Thermal Oxidizer Temperature**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each catalytic oxidizer in the control system used to control emissions from Press #37 and Press #38. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Part 70 Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of any catalytic oxidizer in the control system used to control emissions from Press #37 and Press #38 is below the values in the table below. A three (3) hour average temperature that is below the respective value is not a deviation from this permit. Failure to take response steps in accordance with Part 70 Section C – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

Catalytic Oxidizer ID	Minimum 3-hour Average Temperature (°F)
Unit 5, Unit 6, Unit 9, Unit 10	550
Unit 7, Unit 8	650
Unit 11, Unit 12	500

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

**D.6.6 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]**

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following monitoring requirements:

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

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c. can be used as the indicator if such differential is demonstrated as adequate to qualify the permanent total enclosure with Method 204 criteria.

	Indicator #1	Indicator #2	Indicator # 3
			Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
<b>III. Performance Criteria</b>			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Semiannually	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

(1) Rationale for Selection of Performance Indicators

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

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

(2) Rationale for Selection of Indicator Ranges

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

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

(b) Monitoring Approach For Catalytic Oxidizers

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

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

(1) Rationale for Selection of Performance Indicators

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

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

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

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

(2) Rationale for Selection of Indicator Ranges

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

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

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

### **D.6.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent, used for each press.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period (by press).
- (b) To document compliance with Conditions D.6.1, D.6.5 and D.6.6, the Permittee shall maintain records in accordance with (1) and (2) below.
  - (1) The continuous temperature records (reduced to a three-hour average basis) for the Press #37 and Press #38 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (2) Daily records of the duct pressure, or fan amperage or differential pressure.
- (c) To document compliance with Condition D.6.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

### **D.6.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.6.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.7

## FACILITY CONDITIONS

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

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°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 construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## SECTION D.8

## FACILITY CONDITIONS

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

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

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

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

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

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

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

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

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

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section and VCAPC: 812-462-3433); and
  - C** The Permittee must submit notice in writing or by facsimile within two (2) working days (IDEM Facsimile Number: 317-233-5967 and VCAPC Facsimile Number: 812-462-3447), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #13, Press #14, Press #15, and Press #16  
Parameter: VOC emission  
Limit: Combined emission less than 94 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #13, Press #14, Press #15, and Press #16 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
 Part 70 Permit No.: T167-6182-00033  
 Facility: Press #17 and Press #18  
 Parameter: VOC emission  
 Limit: Combined emission less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #17 and Press #18 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #19 and Press #20  
Parameter: VOC emission  
Limit: Combined emissions less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #19 and Press #20 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #21 and Press #22  
Parameter: VOC emission  
Limit: Combined emissions less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #21 and Press #22 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #23, Press #24, and Press #25  
Parameter: VOC emission  
Limit: Combined emissions less than 74.1 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #23, Press #24, Press #25, and Press #26 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #27, Press #28, Press #29, and Press #30  
Parameter: VOC emission  
Limit: Combined emissions less than 38.8 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #27, Press #28, Press #29, and Press #30 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
 Part 70 Permit No.: T167-6182-00033  
 Facility: Press #31 and Press #32  
 Parameter: VOC emission  
 Limit: Combined emissions less than 19.32 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #31 and Press #32 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #34 and Press #35  
Parameter: VOC emission  
Limit: Combined emissions less than 16.85 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #34 and Press #35 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
 Part 70 Permit No.: T167-6182-00033  
 Facility: In-line Presses E5, E15, E17, E18, E19, E20, E22, E23, and E31  
 Parameter: VOC input  
 Limit: Each press input less than 25 tons per 12 consecutive month period with compliance demonstrated at the end of each month  
 QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Press	Month: _____			Month: _____			Month: _____		
	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total
E5									
E15									
E17									
E18									
E19									
E20									
E22									
E23									
E31									

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
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VIGO COUNTY AIR POLLUTION CONTROL**

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: In-line press E11  
Parameter: VOC input  
Limit: Input less than 18 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	In-line press E11		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #33  
Parameter: VOC emission  
Limit: Combined emissions less than 9.72 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #33		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: PO Box 905, Terre Haute, Indiana 47808  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #36  
Parameter: VOC emission  
Limit: Combined emissions less than 39.99 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Mailing Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804  
Part 70 Permit No.: T167-6182-00033  
Facility: Press #37 and Press #38  
Parameter: VOC emission  
Limit: Combined VOC input less than 800 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Press #37 and Press #38 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

9 No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

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

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a Significant Source Modification and  
Significant Permit Modification to a Part 70 Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	Bemis Company, Inc.
<b>Source Location:</b>	1350 North Fruitridge Ave., Terre Haute, Indiana 47804
<b>County:</b>	Vigo
<b>SIC Code:</b>	2673 and 3081 (NAICS Codes 326111 and 322221)
<b>Operation Permit No.:</b>	T167-6182-00033
<b>Operation Permit Issuance Date:</b>	June 28, 2004
<b>Significant Source Modification No.:</b>	SSM 167-21605-00033
<b>Significant Permit Modification No.:</b>	SPM 167-21603-00033
<b>Permit Reviewer:</b>	Rob Harmon

The Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) have reviewed a modification application from Bemis Company relating to the construction and operation of the following flexographic presses:

- (a) Flexographic printing press, identified as press #37, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (b) Flexographic printing press, identified as press #38, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11 and/or 12.

**History**

On July 27, 2005, Bemis Company, Inc. submitted an application to the OAQ and VCAPC requesting to add two additional printing presses to their existing plant. Bemis Company, Inc. was issued a Part 70 Permit on June 28, 2004.

**Existing Approvals**

Bemis Company, Inc. was issued Part 70 permit T167-6182-00033 on June 28, 2004. The following approvals have been issued since that date:

- 1. First PSD/Significant Source Modification, 167-19667-00033, issued on May 2, 2005; and
- 2. First Significant Permit Modification, 167-19669-00033, issued on June 20, 2005.

**Enforcement Issue**

There are no enforcement actions pending relating to this modification.

**Recommendation**

The staff recommends to the Commissioner that the Significant Source or Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

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

## Emission Calculations

Potential to emit calculations for these flexographic printing Presses #37 and #38 were claimed confidential. Bemis Company, Inc. acknowledges that this modification would have been subject to 326 IAC 2-3 (Emission Offset) if they had not voluntarily taken limits on VOC input and on overall control efficiency. Bemis Company, Inc. acknowledges the VOC potential of the modification before control is greater than 100 tons per year so the modification is subject to the requirements of CAM. There are no HAP emissions associated with this source, so there are no HAP related applicability issues. Additionally, Bemis Company, Inc. acknowledges that the new printing presses are subject to the requirements of 326 IAC 8-5-5. By being subject to 326 IAC 8-5-5, they are not also subject to the general VOC reduction requirements of 326 IAC 8-1-6.

## Justification for the Modification

The modification is subject to a Significant Source Modification under 326 IAC 2-7-10.5(f), as it involves construction of new emission units with potential to emit greater than 25 tons per year of VOC (prior to application of control efficiencies or limitations). Also, the modification is subject to a Significant Permit Modification under 326 IAC 2-7-12(d), as it involves significant changes to the monitoring, recordkeeping, and reporting permit terms or conditions relating to the new equipment.

## 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	NA
PM-10	0.3
SO <sub>2</sub>	0.1
VOC	1350.7
CO	2.0
NO <sub>x</sub>	10.0
HAPs	NA

## Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less than 100
PM10	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Greater than 250
CO	Less than 100
NO <sub>x</sub>	Less than 100

- (a) This existing source is a major stationary source under Emission Offset (326 IAC 2-3) and Prevention of Significant Deterioration (PSD, 326 IAC 2-2) because VOC is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon Part 70 Permit T167-6182-00033, issued on June 28, 2004.

**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.

	Limited Potential to Emit (tons/year)					
Process/Facility	PM	PM10	SO2	VOC	CO	NOx
Presses #37 & #38*	-	-	-	Less than 40	-	-
PSD/Emission Offset Significant Level	25	15	40	40	100	40
Significant ?	No	No	No	No	No	No

\*Presses #37 and #38 are limited to less than 40 tons of VOC emissions per 12 consecutive month period.

**County Attainment Status**

The source is located in Vigo County.

Pollutant	Status
PM	Attainment
PM-10	Attainment
PM-2.5	Attainment
SO <sub>2</sub>	Maintenance Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Basic Nonattainment
1-hour ozone	Attainment
CO	Attainment
Lead	Not determined

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as nonattainment for the 8-hour ozone standards. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset.
- (b) Vigo County has been classified as 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) Vigo County has been classified as attainment or unclassifiable for all the 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.

**Federal Rule Applicability**

326 IAC 12, (40 CFR 60.430), Subpart QQ – Standards of Performance for the Graphic Arts Industry. This rule applies specifically to publication rotogravure printing. Presses #37 and #38 are not subject to this NSPS, because they are flexographic printing presses.

326 IAC 14, (40 CFR Part 63.820, Subpart KK – National Emission Standards for the Printing and Publishing Industry. This applies to publication rotogravure, product and packaging rotogravure, or wide-web flexographic

printing presses. Presses #37 and #38 are wide-web flexographic printing presses as defined under Subpart KK. However, because the source is not a source of HAPs, the source is only subject to minor recordkeeping and reporting requirements as necessary to demonstrate its area source status.

#### 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

CAM is applicable to new or modified emission units that involve a pollutant specific emission unit and meet the following criteria:

- (1) The emission unit must be located at a major source for which a Part 70 permit is required.
- (2) Be subject to an emission limitation or standard.
- (3) Use a control device to achieve compliance.
- (4) Have potential precontrol emissions of at least 100 percent of the major source thresholds.

Presses #37 and #38 meet all the above criteria and therefore, are subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring. Bemis Company Inc. submitted a CAM plan for Presses #37 and #38 on November 8, 2005, the contents of which are directly incorporated into new Condition D.6.6 (see below).

### State Rule Applicability - Entire Source

#### 326 IAC 2-3 (Emission Offset)

Press #37 and #38 are limited by this approval to less than 40 tons per year VOC emissions combined. This limit includes the requirement to attain a minimum of 95% overall VOC control, and limit VOC input to the two (2) presses combined to less than 800 tons of VOC per 12 consecutive month period. This limitation is below the significant level for modifications to existing major sources (40 tons per year). Therefore, this modification is not subject to the requirements of 326 IAC 2-3 (Emission Offset).

### State Rule Applicability - Individual Facilities

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

This rule applies to flexographic printing sources constructed after November 1, 1980, located anywhere in the state with potential emissions of twenty-five (25) tons or more of VOC per year.

Pursuant to 326 IAC 8-5-5(e)(3), flexographic printing operations are required to achieve a minimum of sixty percent (60%) overall control efficiency.

Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks shall have an incineration system of 90% destruction efficiency. Bemis Company, Inc. is in compliance with this rule, as Presses #37 and #38 catalytic oxidizers are designed to achieve above 90% destruction efficiency.

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

This rule does not apply to presses #37 and #38, as these presses are subject to 326 IAC 8-5-5.

### Testing Requirements

Bemis Company Inc. operates 27 printing presses that utilize 12 catalytic oxidizers in order to achieve compliance. Each of these printing presses have potential VOC emissions in excess of 40 tons per year (before control) and therefore are subject to periodic testing under the current testing guidance. These units should be tested twice per permit term for VOC Capture and Destruction Efficiency (approximately every 2 ½ years).

Since Press #37 and Press #38 are new units, they each need to be tested for capture efficiency within sixty (60) days of achieving maximum production rate, but no later than one-hundred and eighty (180) days after initial startup. Then they would fall into the same periodic testing schedule as the other existing flexographic printing presses. This modification does not include the addition of any new catalytic oxidizers, so the testing of those control devices would continue along the same schedule as contained in the Part 70 Permit.

## 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 and VCAPC, 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.

1. The Printing Presses (#37 and #38) are effectively monitored through the applicable CAM Plan (40 CFR Part 64 above).
2. Pursuant to the CAM Plan, as required by 40 CFR 64, the catalytic oxidizers (Oxidizers I-5 through I-12) have applicable compliance monitoring conditions as specified below:
  - The inlet temperature to the catalyst bed shall be continuously monitored. If the temperature reading begins to drop below the minimum (which varies with the specific minimum temperatures being outlined in the respective D Section of the Permit), an automated control system shall adjust the operation accordingly. If the temperature can not be maintained, the printing presses relying on this oxidizer for control shall be shut down until the inlet temperature can be maintained or the VOC laden emissions stream can be sent to another catalytic oxidation unit.
  - Annually the catalyst shall be sampled and tested to ensure it is still active. If testing indicates the catalyst can no longer maintain the minimum 95% destruction efficiency at the current minimum temperature then it shall be replaced.

These monitoring conditions are necessary because the capture systems and the catalytic oxidation systems for the printing presses must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations) and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

The oxidation systems must be in operation at all times the printing presses are in operation.

## Changes to the Part 70 Permit

The Part 70 Permit T167-6182-00033, issued on June 28, 2004 will be modified to incorporate the Significant Source Modification 167-21605-00033 (additions are **bolded** and deletions are ~~struck through~~ for emphasis)

*Section A.2 will be modified to include the descriptions of the new emission units. The units previously identified as (34) through (64) are renumbered as (36) through (66) respectively. The new descriptions are as follows:*

- (34) **Flexographic printing press, identified as press #37, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (35) **Flexographic printing press, identified as press #38, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**

*The facility description section of Sections D.1, D.2, D.3, D.4, D.5, and D.6 have been updated to reflect the numbering changes caused by the above addition of new emission units for consistency purposes. Also, the catalytic oxidizers have had their descriptions updated to include these new presses among the units they control.*

*The following Section (D.6) which reflects the new emission units (Press #37 and #38) will be added in the Part 70 permit as follows (Existing Sections D.6 and D.7 will be renumbered as D.7 and D.8 respectively):*

## FACILITY OPERATION CONDITIONS

### Section D.6

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

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

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

#### **D.6.1 Volatile Organic Compounds (VOC) [326 IAC 2-3]**

---

- (a) The input of VOC to Press #37 and Press #38 combined shall be less than 800 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit, in combination with the rest of this condition, is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period.**
- (b) Whenever Press #37 or Press #38 is applying VOC containing materials, each press exhaust must be vented through the operating oxidation control system. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.**
- (c) The capture efficiency system for Presses #37 and #38 shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
  - (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.**
  - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.**
  - (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.**
  - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.**
  - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.**
  - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.****

**Where:**

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

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

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

**Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.**

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

---

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the capture system for the flexographic printers identified as Press #37 and Press #38 in conjunction with the catalytic oxidation systems shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.**
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), when using solvent based inks at the flexographic printers identified as Press #37 and Press #38 the catalytic oxidation systems shall**

maintain a minimum of ninety percent (90%) destruction efficiency.

**D.6.3 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 these facilities and their control devices.

**Compliance Determination Requirements**

**D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

Within sixty (60) days after achieving maximum production rate, but no later than one-hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify compliance with the overall VOC control efficiency (including capture and destruction efficiency) requirement in Condition D.6.1 for the Catalytic Oxidizers utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.6.5 Thermal Oxidizer Temperature**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each catalytic oxidizer in the control system used to control emissions from Press #37 and Press #38. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Part 70 Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of any catalytic oxidizer in the control system used to control emissions from Press #37 and Press #38 is below the values in the table below. A three (3) hour average temperature that is below the respective value is not a deviation from this permit. Failure to take response steps in accordance with Part 70 Section C – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

Catalytic Oxidizer ID	Minimum 3-hour Average Temperature (°F)
Unit 5, Unit 6, Unit 9, Unit 10	550
Unit 7, Unit 8	650
Unit 11, Unit 12	500

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

**D.6.6 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]**

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following monitoring requirements:

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

	Indicator #1	Indicator #2	Indicator # 3
<b>I. Indicator</b>	<b>Work Practice</b>	<b>Work Practice</b>	<b>Pressure differential</b>
<b>Measurement Approach</b>	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
<b>II. Indicator Range</b>	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c. can be used as the indicator if such differential is demonstrated as adequate to qualify the permanent total enclosure with Method 204 criteria.  Alternatively, a three hour average value can be used as the indicator range.
<b>Corrective Action</b>	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
<b>III. Performance Criteria</b>			
<b>A. Data Representativeness</b>	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
<b>B. Verification of Operational Status</b>	Inspection records.	Inspection records.	Not applicable.

	Indicator #1	Indicator #2	Indicator # 3
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Semiannually	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

**(1) Rationale for Selection of Performance Indicators**

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

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

**(2) Rationale for Selection of Indicator Ranges**

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

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

**(b) Monitoring Approach For Catalytic Oxidizers**

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

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

**(1) Rationale for Selection of Performance Indicators**

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

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

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

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

**(2) Rationale for Selection of Indicator Ranges**

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

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

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

### **D.6.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent, used for each press.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period (by press).
- (b) To document compliance with Conditions D.6.1, D.6.5 and D.6.6, the Permittee shall maintain records in accordance with (1) and (2) below.
- (1) The continuous temperature records (reduced to a three-hour average basis) for the Press #37 and Press #38 Catalytic Oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (2) Daily records of the duct pressure, or fan amperage or differential pressure.
- (c) To document compliance with Condition D.6.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

### **D.6.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.6.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

*The Report Form referenced in the new Condition D.6.9 has been added following the existing Report Forms.*

*The Table of Contents has been updated to reflect all appropriate changes.*

*In addition to all the above changes relating to the construction and operation of the two (2) new presses, there were errors found in previous approvals which had to be addressed. The first relates to the maximum heat input capacity of Oxidizers I11 and I12. Those descriptions have been changed as follows:*

- (45) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of ~~4.5~~ 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #38, and exhausting to stack 11.
- (46) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of ~~4.5~~ 3.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19

through #25 and #27 through #38, and exhausting to stack 12.

*The second change relates to the operational temperature of Oxidizers I9 and I10. They were incorrectly listed as having a minimum temperature of 500 °F in prior approvals, but should have been 550 °F. Condition D.3.7 has been modified as follows:*

#### D.3.7 Catalytic Oxidizer Requirements

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- (a) The Permittee shall monitor ~~Unit 5 and Unit 6~~ **Unit 5, Unit 6, Unit 9 and Unit 10** according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 5, ~~and Unit 6,~~ **Unit 9 and Unit 10**) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (b) The Permittee shall monitor Unit 7 and Unit 8 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 7 and Unit 8) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 650°F. A three (3) hour average temperature that is below 650°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the

compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

- (c) The Permittee shall monitor ~~Unit 9, Unit 10,~~ Unit 11 and Unit 12 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (~~Unit 9, Unit 10,~~ Unit 11 and Unit 12) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 500°F. A three (3) hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2 and D.3.3, as approved by IDEM and VCAPC.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

*IDEM's mailing address has changed. This change has been incorporated throughout the Part 70 Permit as necessary:*

Indiana Department of Environmental Management  
Office of Air Quality  
100 North Senate Avenue, P.O. Box 6045  
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

The language in Condition B.25 was changed in order to reflect the current rule language:

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

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~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~

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

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**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.**

### **Conclusion**

The operation of Presses #37 and #38 shall be subject to the conditions of the attached **Significant Source Modification 167-21605-00033 and Significant Permit Modification 167-21603-00033.**