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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 15, 2005

RE: Printpack Industries / 105-21623-00018

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this 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 impractible to raise such issues, or if the grounds for such objection arose after the comment period.

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

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

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

Enclosures
FNTV-PMOD.doc 1/10/05

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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

December 15, 2005

Re: **105-21623-00018**
First Minor Permit Modification to
Part 70 No.: T 105-10511-00018

Dear Mr. Foster:

Printpack, Inc. was issued a 70 Operating Permit **T 105-10511-00018** on April 25, 2000, for a flexographic printing source. A letter requesting changes to this permit was received on July 27, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of one (1) photopolymer plate making system, identified as PH01, and the conditions applicable to that facility. In addition, the Responsible Official has been updated in Condition A.1 of the permit.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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

Sincerely,

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

Attachments (Changed permit pages and Technical Support Document)
CAP/MES
cc: File - Monroe County
Monroe County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Mr. Dan Acus, Printpack, Inc.

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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

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

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

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

Operation Permit No.: T 105-10511-00018	Date Issued: April 25, 2000
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Expiration Date: April 25, 2005

First Administrative Amendment 105-14579-00018, issued August 21, 2001
First Reopening 105-13426-00018, issued February 7, 2002
First Significant Permit Modification No.: 105-15751-00018, issued November 20, 2002
Second Significant Permit Modification No.: 105-16875-00018, issued June 1, 2005

First Minor Permit Modification No.: 105-21623-00018	Affected Pages: 4 and 5 Pages Added: 33a, 33b and 37b
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: December 15, 2005

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary flexographic printing source.

Responsible Official:	Plant Manager
Source Address:	303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address:	303 N. Curry Pike, Bloomington, Indiana 47404
Phone Number:	812 - 339 - 9294
SIC Code:	2759
County Location:	Monroe
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

(a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.

(b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.

(c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.

(d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

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

Compliance Determination Requirements

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(4)(A)] [326 IAC 2-2]

Compliance with the VOC limitation contained in Condition D.4.1 shall be based on the total volatile organic compound input for the previous month, minus the VOC solvent shipped out, and adding it to previous eleven (11) - month total VOC input, minus the VOC solvent shipped out, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

VOC emitted = VI - SO

Where:

VI = The total amount of VOC, in tons, input to the processes listed in Condition D.4.1, including coatings, dilution solvents, and cleaning solvents; and

SO = The total amount of VOC, in tons, shipped out as waste or to be recycled, including coatings, dilution solvents, and cleaning solvents, from the processes listed in Condition D.4.1.

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

D.4.5 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each solvent used.

(2) The amount of solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The amount of VOC solvent shipped out as waste or to be recycled each month. The amount for solvent shipped out shall be determined based upon information from the waste collector, recycler, and/or source;

(4) The total VOC input to the process for each month; and

(5) The weight of VOCs emitted (VOC input, minus the VOC solvent shipped out as waste or to be recycled) for each compliance period.

(b) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.4.6 Reporting Requirements

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

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

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: 105-10511-00018
Facility: One (1) photopolymer plate making system, identified as PH01
Parameter: VOC emitted (The total weight of VOC used, minus the VOC solvent shipped out as waste or to be recycled), VOC emitted = VI - SO
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Minor Permit Modification to a Part 70 Operating Permit

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

On September 14, 2005, the Office of Air Quality (OAQ) had a notice published in the Herald Times, Bloomington, Indiana, stating that Printpack, Inc. had applied for a Minor Permit Modification to a Part 70 Operating Permit to operate a photopolymer plate making system at the existing flexographic printing source. The notice also stated that OAQ proposed to issue a Minor Permit Modification and provided information on how the public could review the proposed Minor Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Minor Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On October 14, 2005, Todd Wiederhold of Printpack, Inc. submitted comments on the proposed Minor Permit Modification to a Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

Section D.4.2 - IDEM has incorrectly determined that the photopoymer plate making system (PH01) is subject to rule 326 IAC 8-3-2 for Cold Cleaner Operations. The photopolymer plate making system does not meet the intent of a "Cold cleaner degreaser." Pursuant to 326 IAC 1-2-18.5, "Cold cleaner degreaser" means a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article. As interpreted by IDEM in the attached cold cleaning degreaser rules guidance issued May 6, 1998, "Degreasing refers to a process that uses a solvent to remove grease, oil, or dirt from the surface of a part, usually prior to surface coating or welding. Cold cleaning is a form of degreasing where the part is dipped into or sprayed with a solvent. Cold cleaners are commonly used in auto repair shops and auto body shops, and in many types of industry." The RACT rule for Organic Solvent Degreasing Operations (326 IAC 8-3) was always intended and has historically been interpreted to apply to maintenance and/or industrial parts washing tanks that are used to clean dirty parts prior to maintenance, reuse or some sort of coating application. The photopolymer plate making system is a process that converts artistic graphics from a film negative onto a photopolymer plate material in order to create a three-dimensional pattern for use on a flexographic printing press. As outlined in the process description provide in the permit application, the photopolymer solvent is used to washout uncured photopolymer in order to create the 3-D printing image. The photopolymer plate making system is not a parts washing or degreasing operation, which is what is intended to be regulated under 326 IAC 8-3. In fact, IDEM has concluded that identical or functionally equivalent polymer plate making processes are not subject to 326 IAC 8-3 as demonstrated in the following permits:

- MSOP 097-15453-00154 issued to Inland Paperboard on July 1, 2003
- OP No. T 167-6754-00103 issued to THE Corporation on December 31, 1998
- OP No. T 167-6182-00033 issued to Bemis Company Inc. on June 28, 2004

- OP No. T 031-5950-00001 issued to Printpack, Inc. on July 15, 2004

[The IDEM, Office of Air Management Rules Guidance, May 1998, "Development of Amendments to Rules Concerning Vapor Pressure of Solvents Used for Cold Cleaning Degreasing in Lake, Porter, Clark and Floyd Counties" was included with this comment.]

Response 1:

The approvals listed do not include 326 IAC 8-3 applicability determinations for plate making systems. Though none of those permits include the requirements of 326 IAC 8-3 for plate making systems, the permits do not indicate that the requirements are not applicable to those units. Without a more complete review, it is impossible to determine whether the requirements of 326 IAC 8-3 are applicable to those units.

The rule guidance provided is for the addition of a section requiring the use of low vapor pressure solvents in cold cleaning degreasing operations in Lake, Porter, Clark and Floyd counties. The sentences quoted in the comment are included in the "Description" section of that document. According to the application provided, the plate making process includes a solvent that is used to wash uncured polymer off of the plates. The plates are then rinsed in a fresh solution. Since solvent is used to clean the plates, this unit is considered a cold cleaner degreaser. There are no changes to the permit in response to this comment.

Comment 2:

Section D.4.1 - Please clarify the definition of total VOC usage to better reflect how records will be maintained. Please add clarifying language to reflect that VOC usage (i.e., VOC lost due to evaporation) equates to the total VOC input, or added to the system minus the total VOC output, or VOC material removed as waste from the system. The plant plans to track the amount of solvent added and the amount of solvent removed as waste.

Response 2:

Condition D.4.1 has been revised, a new condition (Condition D.4.4) has been added, Conditions D.4.4 and D.4.5 (now re-numbered D.4.5 and D.4.6) have been revised, and the parameter on the Quarterly Report Form has been revised, as follows:

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

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

Compliance Determination Requirements

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(4)(A)] [326 IAC 2-2]

Compliance with the VOC limitation contained in Condition D.4.1 shall be based on the total volatile organic compound input for the previous month, minus the VOC solvent shipped out, and adding it to previous eleven (11) - month total VOC input, minus the VOC solvent shipped out, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

VOC emitted = VI - SO

Where:

VI = The total amount of VOC, in tons, input to the processes listed in Condition D.4.1, including coatings, dilution solvents, and cleaning solvents; and

SO = The total amount of VOC, in tons, shipped out as waste or to be recycled, including coatings, dilution solvents, and cleaning solvents, from the processes listed in Condition D.4.1.

D.4.~~4~~**5** Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through ~~(4)~~**(5)** below. Records maintained for (1) through ~~(4)~~**(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each solvent used.

(2) The amount of solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The amount of VOC solvent shipped out as waste or to be recycled each month. The amount for solvent shipped out shall be determined based upon information from the waste collector, recycler, and/or source;

~~(3)~~**(4)** The total VOC ~~usage~~ **input to the process** for each month; and

~~(4)~~**(5)** The weight of VOCs emitted **(VOC input, minus the VOC solvent shipped out as waste or to be recycled)** for each compliance period.

(b) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.4.~~5~~**6** Reporting Requirements

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

The parameter on the quarterly report form has been revised as follows:

Parameter: VOC ~~usage~~ **emitted (The total weight of VOC used, minus the VOC solvent shipped out as waste or to be recycled), VOC emitted = VI - SO**

Comment 3:

Section D.4.4(a)(2) - Please modify the condition so as not to unnecessarily limit the type of recordkeeping allowed to document solvent usage. Printpack requests that D.4.4(a)(2) be revised to read as follows, "Records shall include the documentation necessary to verify the type and amount of solvent used, which may include but is not limited to manual logs, purchase orders, invoices, and material safety data sheets (MSDS)."

Response 3:

IDEM, OAQ, accepts purchase orders, invoices, and material safety data sheets (MSDS), as valid methods to record the type and amount used. Other methods must be specifically reviewed and approved by IDEM, OAQ. As stated in the existing condition, only those necessary are required. Therefore, there is no change to this condition.

Comment 4:

Section D.4.4(a)(2) - Please modify the condition to address recordkeeping requirements to document solvent output. Printpack requests that additional language be added to read as follows, " Records shall include the documentation necessary to verify the amount of solvent removed as waste, which may include but is not limited to manual logs, waste disposal records, waste manifests, and waste profiles."

Response 4:

Condition D.4.4(a) (now D.4.5(a)) has been revised to address this comment as shown in Response 2.

Comment 5:

Page 6 of 6, Section D.4.4(a)(3) - Please provide additional language to help define VOC usage. Printpack requests that the condition be revised to read as follows, "The total VOC usage for each month, which is defined as the total VOC input minus the total VOC output."

Response 5:

Condition D.4.4(a) (now D.4.5(a)) has been revised to address this comment as shown in Response 2.

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

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

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. Used (gal/sq ft)*	Maximum (sq ft/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Optisol washout/rinse**	7.1	100.000%	0.0%	100.0%	0.0%	0.00%	0.02500	52.500	7.09	7.09	9.31	223	40.8	0.00	n/a	100%

*Gallons of material used is 0.25 x the percent not recycled (10%). The percent recycled was provided by the manufacturer. PM Control Efficiency: 0.00%

**There are no HAPs in this material.

Uncontrolled	**9.31**	**223**	**40.8**	**0.00**
Controlled	**9.31**	**223**	**40.8**	**0.00**

METHODOLOGY

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