



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: April 10, 2006
RE: Atlas Chem-Milling / 039-22364-00502
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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

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

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

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

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

Enclosures
FN-REGIS.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204-2251
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Mr. Kreig Lee
Atlas Chem-Milling
1627 West Lusher Avenue
Elkhart, Indiana 46517

April 10, 2006

Re: Registered Construction and Operation Status,
039-22364-00502

Dear Mr. Lee:

The application from Atlas Chem-Milling received on December 13, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following printing plate and photographic plate manufacturing operation to be located at 1627 West Lusher Avenue, Elkhart, Indiana, is classified as registered:

- (a) One (1) natural gas-fired water heater, identified as WH-1, with a maximum capacity of 0.075 MMBtu/hr.
- (b) Two (2) natural gas-fired space heaters, identified as H1 and H2, with a maximum capacity of 0.20 MMBtu/hr each.
- (c) One (1) natural gas-fired space heater, identified as H3, with a maximum capacity of 0.30 MMBtu/hr.
- (d) One (1) natural gas-fired air makeup unit, identified as A1, with a maximum capacity of 0.407 MMBtu/hr.
- (e) One (1) steel plate cleaning operation, identified as PCR-1, including dip tanks and one (1) automated mechanical plate cleaning machine for bright carbon steel with a maximum capacity of cleaning 3.23 plates per hour. The automated plate cleaning machine was installed in 2002.
- (f) Two (2) laminating and printing operations, including two (2) small format laminating presses and one (1) printer, identified as SFLP-1, and one (1) large format laminating press and one (1) printer, identified as LFLP-1, each operation with a maximum capacity of 1.615 plates per hour.
- (g) Two (2) developing operations, including one (1) small format plate developer and electric drying oven, identified as SFD-1, and one (1) large format plate developer and electric drying oven, identified as LFD-1, each with a maximum capacity of 1.615 plates per hour per operation.
- (h) One (1) pre-etching inspection and associated solvent cleaning operation, identified as PEI-1, used to apply nail polish to plates prior to etching, with a maximum capacity of 3.23 plates per hour.

- (i) Five (5) plate etching machines, identified as PEM-1 through PEM-5, utilizing hydrochloric acid, each with a maximum capacity of 0.646 plates per hour, controlled by a wet fume scrubber. PEM-1 and PEM-5 were installed prior to 1998, PEM-2, PEM-3, and PEM-4 were installed between 2002 and 2004 to replace previously permitted equipment.
- (j) Three (3) stripping areas consisting of the one (1) small format automated stripping machine, one (1) small format stripping dip tank, and one (1) large format stripping dip tank, two (2) drying areas consisting of one (1) small format automated dryer and one (1) large format drying area, and the associated inspection operations, identified as SDI-1. The small format automated stripping machine and the small format automated dryer were installed in 2004. These operations have a maximum capacity of 3.23 plates per hour.
- (k) One (1) plate finishing operation, identified as PF-1, with seven (7) CNC machines, each with a maximum capacity of 0.5383 plates per hour, two (2) automated, submerged liquid grinding machines, each with a maximum capacity of 1.615 plates per hour, and one (1) submerged liquid horizontal bandsaw with a maximum capacity of 3.23 plates per hour, and one (1) hand plate finishing and associated solvent cleaning operation, installed prior to 1956, with a maximum capacity to coat 3.23 plates per hour.
- (l) One (1) electrostatic coating and associated solvent cleaning operation, identified as ECB-1, including one (1) electrostatic air atomized coating application booth and gun, and one (1) electric bake oven, with a maximum capacity to coat 3.23 plates per hour, controlled by dry filters.
- (m) One (1) photographic studio, identified as PS-1, with a maximum capacity to coat 3.23 plates per hour.
- (n) Handheld or hand activated grinders for deburring plate edges, identified as ED-1, with a maximum capacity of 3.23 plates per hour.

The following conditions shall be applicable:

- (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:
 - (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 15 minutes (60 readings) in a 6-hour period 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.
- (2) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the electro static coating booth (ECB-1) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (3) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, including the stripping dip tanks (SDI-1), 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.
- (4) Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operations) for conveyorized degreaser operations constructed after January 1, 1980, including the small format automated stripping machine (SDI-1) and the automated mechanical steel plate cleaning machine (PCR-1), the Permittee shall:
 - (a) Minimize carryout emissions by:
 - (1) racking parts for best drainage; and
 - (2) maintaining the vertical conveyor speed at less than eleven (11) feet per minute;
 - (b) 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;
 - (c) Repair solvent leaks immediately, or shut down the degreaser;
 - (d) Not use workplace fans near then degreaser opening;
 - (e) Provide a permanent, conspicuous label summarizing the operating requirements.
- (5) Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreasing operations without remote solvent reservoirs existing as of July 1,

1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, including the steel plate cleaning dipping tanks (PCR-1), the Permittee shall ensure that the following requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) 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^oC) (one hundred degrees Fahrenheit (100^oF));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.
- (b) 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^oC) (one hundred degrees Fahrenheit (100^oF)), 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.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) 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^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) 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.
- (6) Pursuant to 326 IAC 8-2-9(d)(3) (Miscellaneous Metal Coating),

The volatile organic compound (VOC) content of the coating delivered to the applicator at the electrostatic spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance with the VOC content limit above shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits above, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

- (7) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the water heater shall not exceed 0.93 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

For this unit, Q = 1.83 (MMBtu/hr), and Pt = 0.93 lb/MMBtu.

This registration is the first registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Tracy DeHaven Parham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7901 to speak directly to Ms. Parham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Nysa James, Section Chief
Permits Branch
Office of Air Quality

ERG/TDP

cc: File – Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance – Paul Karkiewicz
Permit Tracking
Compliance Data Section
Air Toxics Program Development Section – Mike Brooks

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Atlas Chem-Milling
Address:	1627 West Lusher Avenue
City:	Elkhart, Indiana 46517
Authorized individual:	Kreig Lee
Phone #:	(800) 943-7291
Registration #:	039-22364-00502

I hereby certify that Atlas Chem-Milling is still in operation and is in compliance with the requirements of Registration 039-22364-00502.

Name (typed):
Title:
Signature:
Date:

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

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Atlas Chem-Milling
Source Location:	1627 West Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3479
Registration No.:	039-22364-00502
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed an application from Atlas Chem-Milling relating to the construction and operation of a printing plate and photographic plate manufacturing operation.

History

This source received an exemption (039-9887-00502) on July 15, 1998. On December 13, 2005, this source submitted an application to update process materials and coatings for all processes. This application quantifies emissions from insignificant activities and provides additional data for all process steps. Each of these process steps have existed since the prior application for an exemption and the initial operation of the source. The source replaced etcher PEM-4 in December 2002, eliminated the use of chlorine gas and replaced a fume scrubber in 2003, replaced etchers PEM-2 and PEM-3 in 2004, and replaced and updated some space heating equipment. The etchers and fume scrubber replaced are of the same throughput capacity as their counterparts. Based on the December 13, 2005 application, the source currently qualifies for a registration.

Permitting Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired water heater, identified as WH-1, with a maximum capacity of 0.075 MMBtu/hr.
- (b) Two (2) natural gas-fired space heaters, identified as H1 and H2, with a maximum capacity of 0.20 MMBtu/hr each.
- (c) One (1) natural gas-fired space heater, identified as H3, with a maximum capacity of 0.30 MMBtu/hr.
- (d) One (1) natural gas-fired air makeup unit, identified as A1, with a maximum capacity of 0.407 MMBtu/hr.
- (e) One (1) steel plate cleaning operation, identified as PCR-1, including dip tanks and one (1) automated mechanical plate cleaning machine for bright carbon steel with a maximum capacity of cleaning 3.23 plates per hour. The automated plate cleaning machine was installed in 2002.
- (f) Two (2) laminating and printing operations, including two (2) small format laminating presses and one (1) printer, identified as SFLP-1, and one (1) large format laminating

- press and one (1) printer, identified as LFLP-1, each with a maximum capacity of 1.615 plates per hour.
- (g) Two (2) developing operations, including one (1) small format plate developer and electric drying oven, identified as SFD-1, and one (1) large format plate developer and electric drying oven, identified as LFD-1, each with a maximum capacity of 1.615 plates per hour.
 - (h) One (1) pre-etching inspection and associated solvent cleaning operation, identified as PEI-1, used to apply nail polish to plates prior to etching, with a maximum capacity of 3.23 plates per hour.
 - (i) Five (5) plate etching machines, identified as PEM-1 through PEM-5, utilizing hydrochloric acid, each with a maximum capacity of 0.646 plates per hour, controlled by a wet fume scrubber. PEM-1 and PEM-5 were installed prior to 1998, PEM-2, PEM-3, and PEM-4 were installed between 2002 and 2004 to replace previously permitted equipment.
 - (j) Three (3) stripping areas consisting of the one (1) small format automated stripping machine, one (1) small format stripping dip tank, and one (1) large format stripping dip tank, two (2) drying areas consisting of one (1) small format automated dryer and one (1) large format drying area, and the associated inspection operations, identified as SDI-1. The small format automated stripping machine and the small format automated dryer were installed in 2004. These operations have a maximum capacity of 3.23 plates per hour.
 - (k) One (1) plate finishing operation, identified as PF-1, with seven (7) CNC machines, each with a maximum capacity of 0.5383 plates per hour, two (2) automated, submerged liquid grinding machines, each with a maximum capacity of 1.615 plates per hour, and one (1) submerged liquid horizontal bandsaw with a maximum capacity of 3.23 plates per hour, and one (1) hand plate finishing and associated solvent cleaning operation, installed prior to 1956, with a maximum capacity to coat 3.23 plates per hour.
 - (l) One (1) electrostatic coating and associated solvent cleaning operation, identified as ECB-1, including one (1) electrostatic air atomized coating application booth and gun, and one (1) electric bake oven, with a maximum capacity to coat 3.23 plates per hour, controlled by dry filters.
 - (m) One (1) photographic studio, identified as PS-1, with a maximum capacity to coat 3.23 plates per hour.
 - (n) Handheld or hand activated grinders for deburring plate edges, identified as ED-1, with a maximum capacity of 3.23 plates per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under the previous Exemption 039-9887-00502, issued on July 15, 1998. All conditions from previous approvals were incorporated into this registration.

Enforcement Issue

- (a) IDEM is aware that this printing and photographic plate manufacturing operation is not in compliance with the following requirement:

Pursuant to 326 IAC 2-5.5-1 (Registrations), this source should have applied for a registration prior to December 25, 1999, because the potential to emit of VOC is less than twenty-five (25) tons per year and greater than ten (10) tons per year.

(b) IDEM is reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (in)	Flow Rate (acfm)	Temperature (°F)
WH-1	Water Heater WH-1	25	4	500	350
H1	Space Heater H1	25	6	500	350
H2	Space Heater H2	25	6	500	350
H3	Space Heater H3	25	6	500	350
CR1	Plate Cleaning Operation PCR-1	25	18 x 18	1500	Ambient
FS1	Plate Etching Machines PEM-1 though PEM-5	25	18	4000	125
PS1	Stripping/Drying/Inspection SDI-1	18	24	1500	Ambient
PS2	Stripping/Drying/Inspection SDI-1	18	24	1500	Ambient
PF1	Plate Finishing PF-1	25	4	500	Ambient
SB	Electrostatic Coating Booth ECB-1	25	30	3000	Ambient
OV1	Plate Developing Bake Oven	25	4	500	500
OV2	Plate Developing Bake Oven	25	4	500	500
OV3	Electrostatic Coating Bake Oven	25	4	500	500

Recommendation

The staff recommends to the Commissioner that the operation 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.

A complete application for the purposes of this review was received on December 13, 2005.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 12).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	1.56
PM10	1.59
SO ₂	3.11E-03
VOC	13.22
CO	0.43
NO _x	0.52

HAPs	Potential to Emit (tons/yr)
Dibutyl Phthalate	1.66E-04
Glycol Ethers	0.01
Hydrogen Chloride	2.51
Hydroquinones	0.01
Isocyanates	3.32E-04
MEK	0.30
Methanol	1.74E-03
MIBK	0.16
Toluene	4.70
Total	7.70

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants is less than twenty-five (25) tons per year and the potential to emit of VOC is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7. A registration will be issued.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM 2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Elkhart 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 surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM-10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD and Emission Offset Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	<250
PM2.5	<250
PM-10	<250
SO ₂	<250
VOC	<100
CO	<250
NO _x	<100
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-22364-00502 is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this registration for this source.
- (b) The New Source Performance Standards (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing Subpart QQ (326 IAC 12 and 40 CFR 60.430) are not included in this registration because this facility does not perform rotogravure printing of saleable paper products.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Parts 61, 63) included in this registration for this source.
- (d) The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning (326 IAC 20 and 40 CFR 63.460) are not included in this registration because this facility does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating are not included in this registration. This facility has a potential to emit HAP of less than 10 tons per year for a single HAP and less than 25 tons per year of total HAP; therefore, this facility is not a major source of HAP.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not one of twenty-eight (28) source categories and is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because this source has a potential to emit of less than 250 tons per year of any regulated pollutant and the PTE has never exceeded this threshold. This source is a minor source under PSD for any future modifications.

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County, which was designated as nonattainment for the 8-hour ozone standard in June 2003. Although modified after this date, the source's potential to emit VOC and NOx did not exceed 100 tons per year; therefore, these modifications did not trigger Emission Offset and the source is a minor source under 326 IAC 2-3 for any future modifications.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is not required to operate pursuant to the Part 70 permit program. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of this printing plate and photographic plate manufacturing operation emits less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

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

The natural gas-fired water heater, identified as WH-1, is subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), because the water heater meets the definition of an indirect heating facility as defined in 326 IAC 1-2-19, and the facility was constructed after September 21, 1983. Pursuant to this rule:

the PM emissions from the water heater shall not exceed 0.93 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

For this unit, $Q = 1.83$ (MMBtu/hr), and $Pt = 0.93$ lb/MMBtu.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Particulate from the electrostatic coating booth, identified as ECB-1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

The metal edge deburring operation (identified as ED-1) is not subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes), because the operation is exempt per 326 IAC 6-3-1(b)(13) and 326 IAC 2-7-1(40)(F).

The plate etching machines, identified as PEM-1 through PEM-5, are not subject to 326 IAC 6-3-1 (Particulate Emissions from Manufacturing Processes), because the operation utilizes flow coating and is exempt per 326 IAC 6-3-1(a)(7).

The laminating and printing operations, identified as SFLP-1 and LFLP-1, and the plate finishing operation, identified as PF-1, are not subject to 326 IAC 6-3-1 (Particulate Emissions from Manufacturing Processes), because the operation utilizes manual brush coating and is exempt per 326 IAC 6-3-1(a)(8).

326 IAC 4-2-2 (Incinerators)

The drying ovens, including units SFD-1 and LFD-1, are not subject to 326 IAC 4-2-2 (Incinerators). Incinerators are defined in 326 IAC 1-2-34 as an "apparatus that burns waste substances". These units are used to dry the solvent and moisture content of coating materials, and do not burn waste substances.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The steel plate cleaning operation, identified as PCR-1, including the dip tanks and one automated mechanical plate cleaning operation and the stripping operations, collectively identified as SDI-1, are subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations). This source is located in Elkhart County. Since the plate cleaning dip tanks were constructed before January 1, 1980, they are not subject to 326 IAC 8-3-2 (Cold Cleaner Operations) or 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). The automated mechanical plant cleaning operation was constructed after January 1, 1980 and is subject to 326 IAC 8-3-4 (Conveyorized Degreaser Operations). The stripping dip tanks were constructed in 1986 and do not have a remote reservoir. The stripping dip tanks are subject to 326 IAC 8-3-2 and 326 IAC 8-3-5.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, including the stripping dip tanks (units of SDI-1) 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.

Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operations) for conveyorized degreaser operations constructed after January 1, 1980, including the small format automated stripping machine (part of SDI-1) and the automated mechanical steel plate cleaning machine (PCR-1), the Permittee shall:

- (a) Minimize carryout emissions by:
 - (1) racking parts for best drainage; and
 - (2) maintaining the vertical conveyor speed at less than eleven (11) feet per minute;
- (b) 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;
- (c) Repair solvent leaks immediately, or shut down the degreaser;
- (d) Not use workplace fans near then degreaser opening;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements.

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreasing operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, including the steel plate cleaning dipping tanks (PCR-1), the Permittee shall ensure that the following requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) 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^oC) (one hundred degrees Fahrenheit (100^oF));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.
- (b) 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^oC) (one hundred degrees Fahrenheit (100^oF)), 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.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) 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^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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

The laminating and printing operations, identified as SFLP-1 and LFLP-1 are not subject to 326 IAC 8-5-5 (Graphic Arts Operations). This source has a potential to emit of VOC of less than twenty-five (25) tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

The laminating and printing operations are not subject to 326 IAC 8-2-5 (Paper Coating Operations) because this source does not use web coating or saturation processes to apply a substrate to paper, plastic, metal foil, or pressure sensitive tapes and labels.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The electrostatic coating booth (ECB-1) is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating) because this facility has actual VOC emissions of greater than fifteen (15) pounds per day. The stripping, drying, and inspections operation (SDI-1) is not subject to this rule because only cleaning solvents are used in this operation and not coatings.

Pursuant to 326 IAC 8-2-9(d)(3) (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the electrostatic coating booth (ECB-1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance with the VOC content limit above shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits above, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

Conclusion

The operation of this printing plate and photographic plate manufacturing operation shall be subject to the conditions of the attached Registration 039-22364-00502.

**Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters**

Company Name: Atlas Chem-Milling
Address: 1627 West Lusher Avenue, Elkhart, IN 46517
Registration No: 039-22364-00502
Reviewer: ERG/TDP
Date: January 4, 2006

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMSCF/yr)
Water Heater	1	WH-1	0.075	0.6
Plant Heater	2	H1 - H2	0.200	3.4
Plant Heater	1	H3	0.300	2.6
Air Makeup Unit	1	A1	0.407	3.5
Total	5		1.18	10.2

Emission Factor (lbs/MMSCF)						
PM*	PM10*	SO2	NOX**	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO2	NOX	CO	VOC	HAPs
WH-1	6.12E-04	2.45E-03	1.93E-04	0.03	0.03	1.77E-03	2.8E-05
H1 - H2	3.26E-03	0.01	0.001	0.17	0.14	0.01	1.5E-04
H3	2.45E-03	0.01	0.001	0.13	0.11	0.01	1.1E-04
A1	0.003	0.013	0.001	0.17	0.15	0.01	1.5E-04
TOTALS	0.01	0.04	3.05E-03	0.51	0.43	0.03	4.4E-04

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

**Emission factor for NOx: Uncontrolled = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

METHODOLOGY

Max. Potential Throughput (MMSCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMSCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMSCF/yr) x Emission Factor (lbs/MMSCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.