INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: August 28, 2007

RE: Sonoco Flexible Packaging, Inc. / 081-23492-00005

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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100 North Senate Avenue
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Indianapolis, Indiana 46204-2251
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Mr. Christopher Fluder
Sonoco Flexible Packaging
P.O. Box 188
Edinburgh, Indiana 46124

August 28, 2007

Re: 081-23492-00005
PSD/First Significant Source Modification to
Part 70 Permit No.: T081-7183-00005

Dear Mr. Fluder:

Sonoco Flexible Packaging was issued Part 70 operating permit T081-7183-00005 on July 1, 2003, for their existing source located at 6502 South U.S. Highway 31, Edinburgh, Indiana 46124. An application to modify the source was received on August 9, 2006. This Significant Source Modification consists of a revision to the existing rotogravure printing press emission unit EU 101's overall control efficiency and the annual VOC input limitation on EU 101.

Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-2-8(a)(1), the approval to construct, under 326 IAC 2-2-2(b), shall become invalid if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source=s Part 70 Operating Permit to incorporate the required operation conditions.

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 Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/ST

cc: File – Johnson County
U.S. EPA, Region V
Johnson County Health Department
Air Compliance Section Inspector: Vaughn Ison
Compliance Data Section
Administrative and Development
Billing, Licensing and Training Section - Dan Stamatkin
Office of Enforcement - Janusz Johnson

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PREVENTION OF SIGNIFICANT DETERIORATION (PSD) AND PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

Sonoco Flexible Packaging
6502 S. U.S. Highway 31
Edinburgh, Indiana 46124

(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. 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.

Second Significant Source Modification No.: 081-23492-00005	
Issued by: *Original signed by* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 28, 2007

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

Source Address:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
Mailing Address:	P.O. Box 188, Edinburgh, IN 46124-0188
General Source Phone Number:	(812) 526-5511, ext. 224
SIC Code:	2671, 2754, 2759, 3089
County Location:	Johnson
Source Location Status:	Non-attainment for PM2.5 and 8-hr ozone Attainment for all remaining criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD, and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not in 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)]

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

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack S11. Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13. Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator.

(2) One (1) coating/adhesive lamination deck.

(3) One (1) coating deck.

(4) Two (2) coating station dryers.

(h) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators.

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour.

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

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):

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold cleaner degreasing units, EU 102 and EU 105, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether. EU 102 is limited to 12 cycles per day and 350 days per year.) [326 IAC 8-3].

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 it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack S11. Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13. Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.

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

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

D.2.1 PSD Requirements [326 IAC 2-2-3] [326 IAC 8-5-5]

(a) Pursuant to 326 IAC 2-2-3 (PSD BACT) and SSM 081-23492-00005:

(1) The VOC emissions from the rotogravure printing press EU 101 (6RL) shall be controlled by a combination of a permanent total enclosure, with a capture efficiency of 100%, and a thermal oxidizer.

(2) The overall VOC control efficiency for the thermal oxidizer controlling the emissions from rotogravure printing press EU 101 (6RL) (including the capture efficiency and destruction efficiency) shall be at least 97.5%.

(3) The total amount of VOC delivered to the rotogravure printing press EU 101 (6RL) shall be limited to less than 6,738 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these PSD BACT requirements will also satisfy the requirements of 326 IAC 8-5-5.

(b) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(1) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to 1510 tons per consecutive 12-month period, with compliance determined at the end of each month.

(2) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal oxidizer.

(3) All access doors and windows of the 8RL enclosure whose areas were not included in the area of all natural draft openings in the original total enclosure calculation shall be closed during routine operation of the process.

(4) The 8RL thermal oxidizer shall operate at all times the 8RL rotogravure printing press (EU 103) is operated. When operating, the 8RL thermal oxidizer shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain at least ninety-eight percent (98%) destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

These conditions, combined with the PTE of the 8RL degreaser (EU 105), are necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable.

D.2.2 Volatile Organic Compound Emission Limitations for Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5,

(a) the destruction efficiency of the 6RL thermal oxidizer shall be a minimum of ninety percent (90%).

(b) the destruction efficiency of the 8RL thermal oxidizer shall be a minimum of ninety percent (90%).

(c) facility 8RL shall maintain an overall control efficiency of sixty-five percent (65%).

D.2.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). A copy of this rule is attached.

(a) Organic HAP emissions from the rotogravure printing presses, 6RL (EU 101) and 8RL (EU 103), shall be limited to no more than four percent (4%) of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for each month.

(b) Pursuant to 40 CFR 63.825(b)(4), (f)(5), and (f)(7), the Permittee shall demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg material applied, as determined by the following equation:

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

where the symbols of this equation are defined in 40 CFR 63.822(b). The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

D.2.5 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 each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), and each corresponding control device.

Compliance Determination Requirements

D.2.6 Thermal Oxidizer Compliance [326 IAC 8-1-2(a)]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 6RL thermal oxidizer to achieve compliance with Conditions D.2.1(b), and D.2.2(a).

(b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.2.1(c), D.2.2(b), and D.2.2(c).

D.2.7 Volatile Organic Compounds (VOC) Testing Requirements [326 IAC 8-1-4(a)(3)]

Pursuant to 326 IAC 8-1-4(a)(3), the Permittee shall use Method 24 to determine compliance with the VOC content and usage limitations described under Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) The Permittee shall conduct a performance test between January 1, 2006 and July 30, 2006 to verify compliance with the VOC control efficiency as per Conditions D.2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.2.1(c), D.2.2(b), and D.2.2(c) for the 8RL rotogravure printing press (EU 103) and the 8RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.9 Testing Requirements [40 CFR 63, Subpart KK] [326 IAC 20-18-1]

The organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied shall be determined pursuant to 40 CFR 63.827(b)(2).

D.2.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of the system shall be recorded as a three (3) hour average. From the date of issuance of this permit until approved stack test results from testing conducted pursuant to Condition D.2.8(a) are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature of 1,400°F.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test conducted pursuant to Condition D.2.8(a) that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date of the most recently approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test and shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the 6RL 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 – Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.2.11 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1(b), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 6RL thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

D.2.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal Oxidizer 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 – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a violation of 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.2.1(c), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the 8RL 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 – Response to Excursions or Exceedances, shall be considered a violation of this permit.

D.2.13 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(c), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 8RL thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.2.14 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c), D.2.7, D.2.8(a), D.2.8(b), D.2.9, D.2.11(a), D.2.11(b), D.2.11(c), D.2.12(a), D.2.12(b), D.2.13(a), D.2.13(b), D.2.13(c), D.2.14(a), and D.2.14(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

(1) The VOC content of each coating material and solvent used.

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

(3) The total VOC usage, including cleanup solvent VOC for each month.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage.

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

D.2.15 Record Keeping Requirements, Organic HAP Usage [40 CFR 63.829] [326 IAC 20-18-1]

(a) In order to demonstrate compliance with Condition D.2.4, pursuant to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), the Permittee shall maintain the following records on a monthly basis for each product and packaging rotogravure press:

(1) Total weight of all inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied.

(2) Total weight of organic HAP applied.

(b) The Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825.

(c) All records shall be maintained for five years. At a minimum, the most recent two (2) years of data shall be retained on site.

D.2.16 Reporting Requirements

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

(b) To comply with Condition D.2.4, the owner or operator shall comply with the reporting requirements specified under 40 CFR 63.830(b)(1) and (3). On June 1, 1998, the

Permittee notified IDEM pursuant to 40 CFR 63.830(b)(1). On June 29, 2001, the Permittee notified IDEM pursuant to 40 CFR 63.830(b)(3).

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

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: rotogravure printing press, EU 101 (6RL)
Parameter: VOC input
Limit: 6,738 tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Sonoco Flexible Packaging
Source Location:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
County:	Johnson
SIC Code:	2671, 2754, 2759, 3089
Significant Source Modification No.:	081-23492-00005
Significant Permit Modification No.:	081-24551-00005
Operating Permit No.:	T081-7183-00005
Permit Reviewer:	ERG/ST

On July 13, 2007, the Office of Air Quality (OAQ) had a notice published in the Daily Journal, Franklin, Indiana, stating that Sonoco Flexible Packaging had applied for a Significant Source Modification and Significant Permit Modification to their Part 70 Operating Permit. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 2, 2007, Ethan Chatfield of U.S. EPA, Region 5 submitted comments on the proposed Significant Source Modification and Significant Permit Modification. The summary of the comments is as follows:

Comment 1: This source is located in an 8-hour ozone non-attainment area but is undergoing PSD/attainment NSR Review. It appears that an increase in VOC usage, installation of a new thermal oxidizer and revision of an existing synthetic minor limitation would constitute a change in the method of operation requiring a current day actual-to-future actual test and potentially triggering nonattainment NSR. Please provide calculations showing actual-to-future actual emissions for the proposed modification.

IDEM Response to Comment 1: IDEM has determined that this project does not constitute a change in the method of operation or a modification to an existing emission unit. The source is not making any physical modifications to the press. This permitting action is being done in response to a request from the source to reevaluate the PSD BACT requirements for the 6RL press which were established prior to the county's nonattainment designation under the 8-hour ozone standard. In response to this request, IDEM conducted a complete BACT analysis for VOC for the 6RL press and determined that an RTO with an overall control efficiency of 97.5%, and a VOC input limit which limits emissions to 168.5 tons per year, constitutes BACT for this facility. The source did not request an increase in the VOC emission limit from this press, and the BACT evaluation was based on the current limited VOC emissions of 168.5 tons per year. Therefore, this permitting action does not trigger an evaluation under 326 IAC 2-3 (Emission Offset). No changes have been made in response to this comment.

Indiana Department of Environmental Quality
Office of Air Quality

Technical Support Document (TSD) for a
Prevention of Significant Deterioration (PSD) Permit, a
Part 70 Significant Source Modification, and a
Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Sonoco Flexible Packaging
Source Location:	6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
County:	Johnson
SIC Code:	2671, 2754, 2759, 3089
Operation Permit No.:	T081-7183-00005
Operation Permit Issuance Date:	July 1, 2003
PSD/Significant Source Modification No.:	081-23492-00005
PSD/Significant Permit Modification No.:	081-24551-00005
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Sonoco Flexible Packaging for a commercial printing operation that produces coated and laminated printed packaging for food products.

History

This source is subject to the Part 70 Permit Program and is a Major Source under the PSD Rules. Sonoco Flexible Packaging was issued a Part 70 permit on July 1, 2003. On August 9, 2006, Sonoco Flexible Packaging submitted an application to IDEM, OAQ requesting a revision to the existing rotogravure printing press emission unit EU 101's overall control efficiency and annual VOC emissions limitation.

Since EU101 has been permitted under the PSD program, this Prevention of Significant Deterioration (PSD) Permit, Significant Source Modification (081-23492-00005), and Significant Permit Modification (081-24551-00005) includes a PSD BACT re-evaluation for printing press EU 101 (6RL). This permit also revises the existing emission unit EU 101's required minimum overall control efficiency and annual VOC emissions limitation.

Existing Approvals

The source was issued Part 70 Operating Permit T081-7183-00005 on July 1, 2003. The source has since received the following approvals:

(a) Administrative Amendment 081-17977-00005, issued on August 22, 2003;

(b) Appeal Resolution 081-17782-00005, issued July 14, 2005; and

(c) Minor Permit Modification 081-21218-00005, issued on September 21, 2005.

County Attainment Status

The source is located in Johnson County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(a) 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. Johnson County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Johnson County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review (326 IAC 2-1.1-5).

(c) Johnson County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

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	<100
PM10	<100
SO_2	<100
VOC	>250
CO	<100
NO_x	<100
Combination HAPs	Greater than 25

(a) At the time that SSM 081-12310-00005 was issued in November 2000, Johnson County was an attainment area for 1-hour ozone. This existing source was a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant was emitted at a rate of 250 tons per year or more, and it was not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) At the time of review of this permit (SSM 081-23492-00005), this existing source is a major stationary source under Emission Offset (326 IAC 2-3) because VOC, a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

(c) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

(d) These emissions are based upon the SSM 081-12310-00005 issued to the source on November 14, 2000 and Title V T081-7183-00005 issued to the source on July 1, 2003.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	1
PM10	1
SO_2	0
VOC	350
CO	6
NO_x	8
HAP	Not Reported

Enforcement Issue

IDEM is aware that there is a pending enforcement action (Notice of Violation Case No. 2006-16089-A, signed December 11, 2006) for printing press EU 105 (8 RL) and the degreaser relating to an exceedance of the VOC limit in Condition D.2.1(c) of Part 70 Operating permit T081-7183-00005, issued July 1, 2003. IDEM is reviewing this matter and will take the appropriate action.

PSD BACT Determination - Printing Press EU 101 (6RL)

On February 23, 2007, Sonoco submitted a revised PSD BACT for printing press EU 101 (6RL). Pursuant to 326 IAC 2-2-3 (PSD: Best Available Control Technology), the revised PSD BACT for the rotogravure printing press identified as EU 101 (6RL) is as follows:

(a) The VOC emissions from the rotogravure printing press EU 101 (6RL) shall be controlled by a combination of a permanent total enclosure, with a capture efficiency of 100%, and a thermal oxidizer. In the previous BACT analysis, capture efficiency was not specified.

(b) The overall VOC control efficiency for the thermal oxidizer controlling the emissions from rotogravure printing press EU 101 (6RL) (including the capture efficiency and destruction efficiency) shall be at least 97.5%. This was revised from the original overall control efficiency requirement of 78.9%.

(c) The total amount of VOC delivered to the rotogravure printing press EU 101 (6RL) shall be limited to less than 6,738 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This was revised from the original limit of 798.34 tons per twelve (12) consecutive month period.

See TSD Appendix B for a full discussion of the PSD BACT determination.

Emission Calculations - Modification to VOC Input Limit for EU 101 (6RL)

The applicant has requested to increase the VOC input at EU 101 (6RL) from its present VOC input limit of 798.34 tons per year to 6,738 tons per year and to change the percent VOC reduction efficiency requirement from 78.9% to 97.5%, and maintaining the limited PTE of VOC at 168.45 tons/year.

In January 2006, the source completed construction of a total enclosure around EU 101 (6RL). Testing of the enclosure and RTO on EU 101 (6RL) was conducted on April 5, 2006. The test results were validated by IDEM on May 14, 2006. The testing confirmed that the capture efficiency was 100% and the VOC destruction efficiency was 95.7%. Upon completion and testing of the enclosure and thermal oxidizer, the enclosure and control device achieved a higher overall control efficiency than the previous permit limit. Based on these test results, the source requested a higher VOC input limit for EU 101 (6RL). The Permittee plans to replace the current thermal oxidizer (with a VOC control efficiency of 95.7%) with a thermal oxidizer having a minimum VOC control efficiency of 97.5%.

The existing EU 101 (6RL) VOC calculations are based on current permit conditions (081-21218-00005, issued on September 21, 2005). The current conditions require that EU 101 (6RL) limit the maximum input VOC to 798.34 tons/year and maintain a minimum 78.9% overall control efficiency.

EU 101 emissions limit = maximum input VOC * (1 – overall control efficiency) = 798.34 tons/year * (1 – 0.789) = 168.45 tons/year of VOC emissions

Using the requested VOC limit and the new overall control efficiency (97.5%) as required in the BACT (see Appendix B), the emission unit EU 101 (6RL) will have the same controlled emissions (168.45 tons per year) based on revised control efficiency as follows:

Emissions limit = Maximum Input VOC * (1 – (overall control efficiency / 100))
= Maximum Input VOC * (1 – (97.5 / 100))
= 6,738 tons/ year * (1 - .975)
= 168.45 tons per year of VOC emissions

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency."

The following tables are used to determine the appropriate permit level under 326 IAC 2-7-10.5. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Limited and Controlled Potential to Emit of Printing Line EU 101 (6RL)

Pollutant	PTE Before Modification (tons/year)	PTE After Modification (tons/year)	Net difference (tons/year)
PM	--	--	--
PM10	--	--	--
SO_2	--	--	--
VOC	168.45	168.45	0
CO	--	--	--
NO_X	--	--	--
HAPs	--	--	--

Uncontrolled Potential to Emit of Thermal Oxidizer and Total PTE for Modification

Pollutant	PTE of New Emission Unit (Thermal Oxidizer) (tons/year)	Net Increase to PTE of Modified Emission Unit (EU 101) (tons/year)	Total PTE for New and Modified Units (tons/year)
PM	0.20	--	0.20
PM10	0.78	--	0.78
SO_2	0.06	--	0.06
VOC	0.57	0	0.57
CO	8.66	--	8.66
NO_X	10.3	--	10.3
HAPs	0.19	--	0.19

This modification is being processed as a Significant Source Modification issued pursuant to 326 IAC 2-7-10.5(f)(1) because it revises a PSD BACT condition in the existing permit. This modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d) because this modification requires a case-by-case determination of an emission limit.

Federal Rule Applicability Determination

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this modification.

(b) There are no changes in the applicability of the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK, 326 IAC 20-18) due to this modification.

(c) 40 CFR 64 Compliance Assurance Monitoring: This permit modification does not involve modification to a pollutant-specific emissions unit as defined in 40 CFR 64.1 for at least one criteria pollutant: with the potential to emit before controls equal to or greater than the major source threshold for at least one criteria pollutant, that is subject to an emission limitation or standard for at least one criteria pollutant, and uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM), are not applicable to this modification. CAM does apply to EU101, but EU101 is not being modified at this time and CAM for EU101 will be addressed as part of the renewal permit.

State Rule Applicability Determination

326 IAC 2-1.1-5 (Nonattainment New Source Review)

Johnson County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Non-attainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 Emission Offset program as a surrogate to address the requirements of Nonattainment New Source Review for the PM2.5 NAAQS. A major source in a non-attainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Sonoco Flexible Packaging has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 (Nonattainment New Source Review) does not apply.

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

The operation of printing press EU 101 (6RL) will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this facility (printing press EU 101 (6RL)) is specifically regulated by the National Emission Standards for Hazardous Air Pollutants for the Printing and

Publishing Industry, 40 CFR Part 63, Subpart KK, which was issued pursuant to Section 112(d) of the CAA, this facility (printing press EU 101 (6RL)) is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 8-5-5 (Volatile Organic Compound Emission Limitations for Graphic Arts Operations)
Pursuant to 326 IAC 8-5-5, the destruction efficiency of the EU 101 (6RL) thermal oxidizer shall be a minimum of ninety percent (90%). This requirement remains unchanged as a result of this permit modification.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source=s failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this modification are as follows:

1. The 11-station rotogravure printing press EU 101 (6RL) has applicable compliance determination conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of the system shall be recorded as a three (3) hour average.

   (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test conducted pursuant to Condition D.2.8(a) that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

   (c) On and after the date of the most recently approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test shown to result in an overall control efficiency of 97.5%. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances, whenever the three (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 – Response to Excursions or Exceedances, shall be considered a violation of this permit.

   (d) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the VOC input limits in the permit, as approved by IDEM.

(e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit T081-7183-00005. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**. The TOC has been updated as necessary.

1. The contact information for IDEM, OAQ has been changed throughout the permit, and mail codes have been added.

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue
Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Data Compliance Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**
Indianapolis, Indiana 46204**-2251**

Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865**

2. IDEM has removed the responsible official information from Section A.1. The SIC codes have been updated. Also, the 8 hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore, provisions of 326 IAC 2-3 are applicable in these areas. IDEM has deleted the Nonattainment NSR term from the permit and has added that this facility is not in 1 of the 28 source categories.

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

The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

~~Responsible Official:~~	~~Jeff Cheak~~
Source Address:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
Mailing Address:	P.O. Box 188, ~~U.S. 31 North,~~ Edinburgh, IN 46124-0188
General Source Phone Number:	(812) 526-5511, ext. 224
SIC Code:	2671, 2754, 2759**, 3089**
County Location:	Johnson
Source Location Status:	Non-attainment for PM2.5 and 8-hr ozone Attainment for all remaining criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD, **and** Emission Offset Rules ~~and Non-attainment NSR~~ Major Source, Section 112 of the Clean Air Act **Not in 1 of 28 source categories**

3. The following Section B conditions have been revised, deleted or added to the permit to clarify the permit and condition terms and rules cites have been updated:

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

(a) This permit**, T081-7183-00005,** is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-

15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

4. Typographical errors in Conditions B.8 and B.9 have been corrected.

~~B.7~~**B.8** Duty to Provide Information [326 IAC 2-7-5(6)(E)]

~~(b)~~**(a)** The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

~~(c)~~**(b)** For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

~~B.8~~**B.9** Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

. . .

~~(d)~~**(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.

5. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, paragraph (b) In Condition B.12 has been deleted and Condition B.13 has been amended.

~~B.11~~**B.12** 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]

. . .

~~(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)~~**(b)** A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or

potential to emit. The ~~PMP does~~ **PMPs do** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~**(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

~~B.12~~**B.13** Emergency Provisions [326 IAC 2-7-16]

. . .

(b) . . .

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5~~674~~ **0178** (ask for Compliance Section)
Facsimile Number: 317-233-~~5967~~ **6865**

(e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

6. Condition B.15 has been revised to clarify the condition terms and rules cites for Conditions B.15 and B.18 have been updated:

~~B.14~~**B.15** Prior Permits Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

(a) All terms and conditions of ~~previous~~ permits **established prior to T081-7183-00005 and** issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised **under 326 IAC 2-7-10.5**, or

(3) deleted **under 326 IAC 2-7-10.5.**

by this permit.

(b) **Provided that all terms and conditions are accurately reflected in this permit, all** ~~All~~ previous registrations and permits are superseded by this permit.

~~B.17~~**B.18** Permit Renewal [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

…

7. IDEM has decided to remove (d) concerning nonroad engines from B.19 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

~~B.18~~**B.19** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

. . .

~~(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.~~

8. IDEM has clarified Condition B.20 Operational Flexibility as follows:

~~B.20~~**B.21** Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

~~(a)~~ . . .

(a) . . .

(3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

9. B.22 has been updated to include a new "b" concerning modifications to a major source.

~~B.21~~**B.22** Source Modification Requirement [326 IAC 2-7-10.5] **[326 IAC 2-2-2] [326 IAC 2-3-2]**

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

10. For clarity, an additional rule cite has been added to Condition B.23 Inspection and Entry.

~~B.22~~**B.23** Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] **[IC 13-17-3-2]** [IC 13-30-3-1]

11. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained these requirements.

C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour ~~[40 CFR 52, Subpart P]~~ [326 IAC 6-3-2]

~~(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(b)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

12. 326 IAC 9 was approved into the Indiana SIP on November 30, 2004, with an effective date of January 31, 2005. Therefore, 326 IAC 9-1-2 is now federally enforceable. Condition C.4 has been modified as follows:

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

The Permittee shall not operate an oxidizer 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.~~

13. Operation of equipment was listed two places in the permit. IDEM has decided that it is best to have this requirement under compliance determination in the specific D conditions; therefore, it has been deleted from the C Section. Section C conditions have been renumbered as necessary.

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

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

14. IDEM realizes that the specifications listed in Condition C.11 can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

~~C.12~~**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)]

(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~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected ~~normal~~ **maximum** reading **for the normal range** 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 a temperature or flow rate, 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)~~**(b)** The Permittee may request **that** the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

15. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title.

~~C.15~~**C.14** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [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 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 time frame 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, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the 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.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

16. A rule cite in Condition C.17 has been corrected, and the language has been updated:

~~C.18~~**C.17** General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**[326 IAC 2-2][326 IAC 2-3]**

. . .

(c) If there is ~~a reasonable possibility that~~ a "project" (as defined in 326 IAC 2-2-1(qq) **and/**or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a ~~Clean Unit,~~ **source with a Plant-wide Applicability Limitation (PAL),** which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) **and/**or 326 IAC 2-3-1(z)) ~~may result in a significant emissions increase~~ and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) . . .

(C) . . .

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) or 326 IAC 2-3-1(mm)(2)(A)(~~3~~ **iii**)); and

17. The following changes to Condition C.18 were made to incorporate recent revisions to the New Source Review requirements in 326 IAC 2-3.

~~C.19~~**C.18** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] **[326 IAC 2-2][326 IAC 2-3]**

. . .

(h) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

18. The requirement to submit a MACT Application has been removed from the permit, as this source is subject to 40 CFR 63, Subpart KK.

~~Part 2 MACT Application Submittal Requirement~~

~~C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(3) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(4) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(5) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided~~

~~in the MACT standard, if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Data Section, Office of Air Quality~~
~~100 North Senate Avenue~~
~~MC 61-53 IGCN 1003~~
~~Indianapolis, Indiana 46204-2251~~

~~and~~

~~United States Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

19. Title V rules require that records be kept for a period of five years. The following change has been made to condition D.1.2.

D.1.2 Record Keeping Requirements, New Source Performance Standards [326 IAC 12] [40 CFR 60.40c]

Pursuant to 40 CFR 60.40c (Subpart Dc), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day, for each boiler, EU 11 and EU 12, as described under 40 CFR 60.48c. The Permittee shall maintain these records for a period of ~~two (2)~~ **five (5)** years.

20. The PSD BACT requirements for printing line EU 101 (6RL) have been revised and clarified as follows:

D.2.1 PSD Requirements [326 IAC 2-2-3] **[326 IAC 8-5-5]**

~~(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall be less than 798.34 tons per consecutive 12-month period, with compliance determined at the end of each month.~~

~~(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of 78.9 %. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.~~

(a) Pursuant to 326 IAC 2-2-3 (PSD BACT) and SSM 081-23492-00005:

(1) The VOC emissions from the rotogravure printing press EU 101 (6RL) shall be controlled by a combination of a permanent total enclosure, with a capture efficiency of 100%, and a thermal oxidizer.

(2) The overall VOC control efficiency for the thermal oxidizer controlling the emissions from rotogravure printing press EU 101 (6RL) (including the capture efficiency and destruction efficiency) shall be at least 97.5%.

(2) The total amount of VOC delivered to the rotogravure printing press EU 101 (6RL) shall be limited to less than 6,738 tons per twelve (12) consecutive month period, with compliance determine at the end of each month.

Compliance with these PSD BACT requirements will also satisfy the requirements

of 326 IAC 8-5-5.

~~(c)~~**(b)** Pursuant to CP 081-4414-00005, issued on August 28, 1995,
. . .

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

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, ~~U.S. 31 North~~, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: ~~6RL~~ rotogravure printing press, EU 101 **(6RL)**
Parameter: ~~Solvent~~ **VOC** input
Limit: ~~798.34~~ **6,738** tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	~~Solvent~~**VOC** Input (tons)	~~Solvent~~**VOC** Input (tons)	~~Solvent~~**VOC** Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

21. The following conditions have been updated to reflect changes in the title of Condition C.14 of the permit.

D.2.10 Thermal Oxidizer Temperature

(a) . . .

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test conducted pursuant to Condition D.2.8(a) that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date of the most recently approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test and shall take appropriate response steps in accordance with Section C - ~~Compliance Response Plan - Preparation,~~

~~Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** whenever the three (3) hour average temperature of the 6RL 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~~ **Response to Excursions or Exceedances**, shall be considered a violation of this permit.

D.2.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal Oxidizer 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~~ **Response to Excursions or Exceedances** whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°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~~ **Response to Excursions or Exceedances** shall be considered a violation of this permit.

(b) . . .

(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~~ **Response to Excursions or Exceedances** whenever the three (3) hour average temperature of the 8RL 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~~ **Response to Excursions or Exceedances** shall be considered a violation of this permit.

D.2.13 Parametric Monitoring

(a) . . .

(b) The duct pressure or fan amperage shall be observed at least once per day when the 8RL thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A reading that is outside the range as established in the most recent 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~~ **Response to Excursions or Exceedances** shall be considered a violation of this permit.

D.4.9 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal oxidizer 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~~ **Response to Excursions or Exceedances**, whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°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~~ **Response to Excursions or Exceedances**, shall be considered a violation of this permit.

(b) . . .

(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~~ **Response to Excursions or Exceedances** whenever the three (3) hour average temperature of the 8RL 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~~ **Response to Excursions or Exceedances**, shall be considered a violation of this permit.

D.4.10 Parametric Monitoring

. . .

When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A reading that is outside the range as established in the most recent 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~~ **Response to Excursions or Exceedances**, shall be considered a violation of this permit.

22. The equipment description for the rotogravure printing presses EU101 and EU103 has been revised to indicate these units are subject to 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry).

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:

…

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack S11. **Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.**

…

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13. **Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.**

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack 11. **Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.**

(e) One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13. **Under 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), this is an affected source.**

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

Conclusion and Recommendation

This source shall be subject to the conditions of the attached proposed Prevention of Significant Deterioration (PSD) Permit, Part 70 Significant Source Modification (081-23492-00005), and Part 70 Significant Permit Modification (081-24551-00005). The staff recommend to the Commissioner that this Prevention of Significant Deterioration (PSD) Permit, Part 70 Significant Source Modification, and Part 70 Significant Permit Modification be approved.

Appendix A: Emission Calculations

Company Name: Sonoco Flexible Packaging
Address: U.S. 31 North, Edinburg, IN 46124
SSM: 081-23492-00005
Reviewer: ERG/ST
Date: June 22, 2007

Uncontrolled PTE (tons/year) (VOC Input)	
Emissions Generating Activity	
Pollutant	EU 101 Line 6RL Thermal Oxidizer
VOC	6,738
Controlled PTE (tons/year)	
Emissions Generating Activity	
Pollutant	EU 101 Line 6RL Thermal Oxidizer
VOC	168.45

Overall control efficiency of 97.5% = 100% capture and 97.5% destruction efficiency

Methodology

Controlled PTE = Uncontrolled PTE (tons/year) x (1 - (Capture Efficiency % x Destruction Efficiency %))

Appendix A: Emission Calculations

Combustion Emissions from the Natural Gas-fired Thermal Oxidizer

Company Name: Sonoco Flexible Packaging
Address: U.S. 31 North, Edinburg, IN 46124
SSM: 081-23492-00005
Reviewer: ERG/ST
Date: June 22, 2007

Heat Input Capacity (MMBtu/hr)
24.0

Potential Throughput (MMCF/yr)
206

Pollutant Emission Factors (lb/MMCF)						
PM*	**PM10***	**SO_2**	**NO_X****	**CO**	**VOC**	**HAPs**
1.9	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (ton/yr)						
PM	**PM10**	**SO_2**	**NO_X**	**CO**	**VOC**	**HAPs**
0.20	0.78	0.06	10.3	8.66	0.57	0.19

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

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

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)

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hr/yr) x 1 MMCF/1,020 MMBtu

Potential to Emit (ton/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lb