



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: May 14, 2008

RE: Graphic Packaging International / 113-25199-00022

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Graphic Packaging International  
301 South Progress Drive East  
Kendallville, Indiana 46755**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F113-25199-00022	
Issued by: Original Signed by:	Issuance Date: May 14, 2008
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: May 14, 2018

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 2-8-3(b)]

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The Permittee owns and operates a stationary paperboard printing and folding carton operation.

Source Address:	301 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address:	301 South Progress Drive East, Kendallville, IN 46755
General Source Phone Number:	260-347-7620
SIC Code:	2657
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
  - (1) One (1) cold cleaner degreaser using a non-VOC containing aqueous solution less than or equal to 12.08 gallons per month.
- (f) One (1) 340 gallon fountain solution tote;
- (g) One (1) 330 gallon adhesive tote;
- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge; and
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM<sub>10</sub> emissions less than five pounds per hour.

### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- (a) This permit, F113-25199-00022, is issued for a fixed term of ten (10) 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, 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.

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (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 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office 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: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F113-25199-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases 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 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) 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 maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

## **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (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; and/or
  - (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.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present

or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

(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 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited as follows:

- (a) The HAP delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited such that any single HAP emitted is less than eight and nine-tenths (8.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. Single HAP emissions shall be based on the following equation:

$$\text{Single HAP emissions (tpy)} = \Sigma (\text{Single HAP containing material usage (Gallons)} \times \text{HAP content (lbs/gallon)} \times \text{percent emission factor for material listed in Condition D.1.7 (\%)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

- (b) The HAP delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited such that combined HAPs emitted is less than twenty-three (23.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. Combined HAP emissions shall be based on the following equation:

$$\text{Total HAP emissions (tpy)} = \Sigma (\text{Combined HAP containing material usage (Gallons)} \times \text{HAP content (lbs/gallon)} \times \text{percent emission factor for material listed in Condition D.1.7 (\%)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

Compliance with these limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8]

The VOC delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited such that VOC emitted will not exceed ninety-eight and four-tenths (98.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \Sigma (\text{VOC containing material usage (Gallons)} \times \text{VOC content (lbs/gallon)} \times \text{percent emission factor for material listed in Condition D.1.7 (\%)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

Compliance with this limit shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

**D.1.3 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) Associated with Clean Up Activities [326 IAC 2-8]**

- (a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celcius (20°C);
- (b) The clean-up solvents shall be kept in covered tanks or covered containers during transport and storage; and
- (c) The cleaning cloths used with the clean-up solvents shall be placed in closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

The VOC delivered to each of the four (4) lithographic printing presses and associated clean up activities shall be limited such that the VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \Sigma (\text{VOC containing material usage (Gallons)} \times \text{VOC content (lbs/gallon)} \times \text{percent emission factor for material listed in Condition D.1.7 (\%)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

Compliance with this requirement shall limit VOC emissions to twenty-four and five-tenths (24.5) tons or less per facility, per twelve (12) consecutive month period, and render the requirements of 326 IAC 8-1-6 not applicable to these facilities.

**D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]**

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section, (the four (4) in-line flexographic coating units, identified as P001, P002, P003, and P004), may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, as delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of the printing presses identified as P001, P002, P003, and P004.

**Compliance Determination Requirements**

**D.1.7 Percent Emission Factors**

The following emission factors shall be used in calculating HAP and VOC emissions for Conditions D.1.1, D.1.2, and D.1.4.

Material	% Emission Factor
<u>Ink</u>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<u>Coatings</u>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

#### D.1.8 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC)

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Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, D.1.3, D.1.4, and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(a)(7)]

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Compliance with the VOC content limit in Condition D.1.5 for the in-line flexographic coating unit, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis on days when non-compliant coatings are being used. This volume weighted average shall be determined by the following equation:

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

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

#### D.1.10 VOC and HAP Emissions

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Compliance with Condition D.1.1 for HAP emissions, and Conditions D.1.2, D.1.4 for VOC emissions shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, single HAP and combined HAP usage for the most recent twelve (12) month period.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.1.
- (1) The HAP content of each ink, varnish, coating material and solvent used less water;
  - (2) The amount of ink, varnish, coating material and solvent used on a monthly basis;
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS), or manufacturer formulation data necessary to verify the type and amount used. For inks, the MSDS with highest HAP content may be used to determine compliance.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;

Records shall include purchase orders, invoices and material safety data sheets (MSDS) , or manufacturer formulation data to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
  - (4) The total individual and combined HAPs usage for each month; and
  - (5) The weight of individual and combined HAPs emitted for each compliance period.

- (b) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage/emission limits established in Conditions D.1.2 and D.1.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each ink, varnish, coating material and solvent used less water;
  - (2) The amount of ink, varnish, coating material and solvent used on a monthly basis;
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS), or manufacturer formulation data necessary to verify the type and amount used. For inks, the MSDS with highest VOC content may be used to determine compliance.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;

Records shall include purchase orders, invoices and material safety data sheets (MSDS), or manufacturer formulation data to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
  - (4) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) and (2) below.
- (1) When any non-compliant coating is used on any in-line flexographic coating unit, the volume weighted average VOC content of all the coatings used on that unit, both compliant and noncompliant, shall be used to determine compliance with the limitation for that day for that unit. This volume weighted average shall be determined by the following equation:
$$A = [\sum(C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon  
C is the VOC content of the coating in pounds VOC per gallon and  
U is the usage rate of the coating in gallons per day.
  - (2) A log of the dates of use of non-compliant coatings.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.4 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 authorized individual as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) cold cleaner degreaser using a non-VOC containing aqueous solution less than or equal to 12.08 gallons per month.

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

### Compliance Determination Requirements

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Graphic Packaging International  
Source Address: 301 South Progress Drive East, Kendallville, Indiana 46755  
Mailing Address: 301 South Progress Drive East, Kendallville, IN, 46755  
FESOP Permit No.: F113-25199-00022

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Graphic Packaging International  
Source Address: 301 South Progress Drive East, Kendallville, Indiana 46755  
Mailing Address: 301 South Progress Drive East, Kendallville, IN, 46755  
FESOP Permit No.: F113-25199-00022

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul>
---

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Graphic Packaging Corporation  
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755  
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755  
 FESOP No.: F113-25199-00022  
 Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.  
 Parameter: VOC Emissions  
 Limit: The emissions of VOCs from the four (4) printing presses, including the in-line flexographic coating units and the associated clean up activities shall not exceed ninety-eight and four-tenths (98.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The appropriate VOC emission factors shall be used as listed in Condition D.1.7 for each ink, varnish, coating material, clean up solvent, and other solvents used. The following equation and emission factors shall be used to calculate VOC emissions:

**VOC emissions (tpy) =**  $\Sigma$  (VOC containing material usage (Gallons) **X** VOC content (lbs/gallon) **X** percent emission factor for material listed in Condition D.1.7 (%) **X** 1 ton / 2000 lbs)

Material	% Emission Factor
<b>Ink</b>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<b>Coatings</b>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
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 COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Graphic Packaging Corporation  
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755  
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755  
 FESOP No.: F113-25199-00022  
 Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004.  
 Parameter: VOC Emissions  
 Limit: The input of VOC to each of the four (4) lithographic printing presses and associated clean up activities shall be limited to twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The appropriate VOC emission factors shall be used as listed in Condition D.1.7 for each ink, varnish, coating material, clean up solvent, and other solvents used. The following equation and emission factors shall be used to calculate VOC emissions:

**VOC emissions (tpy)** =  $\Sigma$  (VOC containing material usage (Gallons) X VOC content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)

Material	% Emission Factor
<b>Ink</b>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<b>Coatings</b>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

YEAR:

Month	Emission Unit		Column 1		Column 2		Column 1 + Column 2	
			VOC Usage This Month		VOC Usage Previous 11 Months		VOC Usage 12 Month Total	
Month 1	P001	P002						
	P003	P004						
Month 2	P001	P002						
	P003	P004						
Month 3	P001	P002						
	P003	P004						

- 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 COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Graphic Packaging Corporation  
 Source Address: 301 South Progress Drive East, Kendallville, IN 46755  
 Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755  
 FESOP No.: F113-25199-00022  
 Facility: four (4) printing presses identified as P001, P002, P003, and P004, and associated clean up activities  
 Parameter: Single HAP and Total HAP Emissions  
 Limit:

- (a) The emissions of any single HAP from the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to eight and nine-tenths (8.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The emissions of any combination of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to twenty-three (23.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period  
 The appropriate HAP emission factors shall be used as listed in Condition D.1.7 for each ink, varnish, coating material, clean up solvent, and other solvents used. The following equations and emission factors shall be used to calculate HAP emissions:
- (a) Single HAP emissions (tpy) =  $\Sigma$  (Single HAP containing material usage (Gallons) X HAP content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)
- (b) Total HAP emissions (tpy) =  $\Sigma$  (Combined HAP containing material usage (Gallons) X HAP content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)

Material	% Emission Factor
<b>Ink</b>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<b>Coatings</b>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 12 Month Total
Month 1						
Month 2						
Month 3						

- No deviation occurred in this quarter.  
 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_  
 Attach a signed certification to complete this report.

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Graphic Packaging International  
 Source Address: 301 South Progress Drive East, Kendallville, Indiana 46755  
 Mailing Address: 301 South Progress Drive East, Kendallville, IN, 46755  
 FESOP Permit No.: F113-25199-00022

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

### Source Background and Description

**Source Name:** Graphic Packaging International  
**Source Location:** 301 South Progress Drive East, Kendallville, Indiana 46755  
**County:** Noble  
**SIC Code:** 2657  
**Operation Permit No.:** F113-25199-00022  
**Permit Reviewer:** APT

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Graphic Packaging International relating to the operation of a stationary paperboard printing and folding carton operation. Graphic Packaging International (formerly James River Paper Company, Inc. and then Fort James Corporation and then Graphic Packaging Corporation) was issued a FESOP F113-14980-00022 on May 23, 2003.

### Permitted Emission Units and Pollution Control Equipment

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

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

### Unpermitted Emission Units and Pollution Control Equipment

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

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
  - (1) One (1) cold cleaner degreaser using a non-VOC containing aqueous solution less than or equal to 12.08 gallons per month.
- (f) One (1) 340 gallon fountain solution tote;

- (g) One (1) 330 gallon adhesive tote;
- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge; and
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM<sub>10</sub> emissions less than five pounds per hour.

### **Existing Approvals**

The source has been operating under the following previous approvals:

- (a) First FESOP Renewal 113-14980-00022, issued on May 23, 2003;
- (b) First Administrative Amendment 113-18013-00022, issued September 10, 2003;
- (c) Appeal Resolution, Minor Permit Modification 113-17841-00022, issued March 10, 2005.

All conditions from previous approvals were incorporated into this FESOP.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete FESOP Renewal application for the purposes of this review was received on August 27, 2007.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (4 pages).

### **Unrestricted Potential Emissions**

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

Table 1.1 reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

**Table 1.1 Potential to Emit Before Controls**

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO <sub>x</sub>	less than 100

**Note:** For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

**Table 1.1 Potential to Emit HAPs Before Controls**

HAP's	Unrestricted Potential Emissions (tons/yr)
single HAP	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE of VOCs to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and the potential to emit any combination of HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all other criteria pollutants is less than one hundred (100) tons per year.

**Potential to Emit After Issuance**

The source, issued a FESOP on May 23, 2003, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Printing presses	0.0	0.0	0.0	98.40	0.0	0.0	8.90	23.0
Insignificant Activities	0.68	0.93	0.03	1.37	3.68	4.38	1.02	1.11
<b>Total PTE After Issuance</b>	0.68	0.93	0.03	99.77	3.68	4.38	9.92	24.11

### County Attainment Status

The source is located in Noble County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
 Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

(Air Pollution Control Board; 326 IAC 1-4-58; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Noble County as nonattainment for PM<sub>2.5</sub>. 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality

- Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone.
- (c) Noble County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
  - (d) 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.
  - (e) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

### **Federal Rule Applicability**

- (a) The four (4) printing presses, identified as P001, P002, P003, and P004, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because the four (4) printing presses are not publication rotogravure printing presses.
- (b) The four (4) printing presses, identified as P001, P002, P003, and P004, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.820 - 63.831, Subpart KK, because the in-line Flexographic coating operation does not meet the definition of a Flexographic press or Flexographic print station.
- (c) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not applicable to this source because a non-halogenated solvent cold cleaner is used.

### **State Rule Applicability - Entire Source**

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

This source is not subject to the requirements of 326 IAC 2-2 (PSD) because the potential emissions of all regulated pollutants is less than 250 tons per year and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Noble County, is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply; however, all sources permitted by the department are subject to section 5 of this rule, additional information requests.

#### **326 IAC 2-8 (FESOP)**

In order to comply with this rule, the following limits shall apply:

- (a) The HAP delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities

shall be limited such that any single HAP emitted is less than eight and nine-tenths (8.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. Each HAP emitted will be based on the following equation:

Single HAP emissions (tpy) =  $\Sigma$  (Single HAP containing material usage (Gallons) X HAP content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)

- (b) The HAP delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited such that combined HAPs emitted is less than twenty-three (23.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide HAP emissions of combined HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period. Total HAP emitted will be based on the following equation:

Total HAP emissions (tpy) =  $\Sigma$  (Combined HAP containing material usage (Gallons) X HAP content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)

- (c) The VOC delivered to the four (4) printing presses, identified as P001, P002, P003, and P004, including in-line flexographic coating units, and the associated clean up activities shall be limited such that VOC emitted shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC emitted will be based on the following equation:

VOC emissions (tpy) =  $\Sigma$  (VOC containing material usage (Gallons) X VOC content (lbs/gallon) X percent emission factor for material listed in Condition D.1.7 (%) X 1 ton / 2000 lbs)

Compliance with these limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

- (d) Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) Associated with Clean Up Activities
- 1) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celcius (20°C); and
  - 2) The clean-up solvents shall be kept in covered tanks or covered containers during transport and storage; and
  - 3) The cleaning cloths used with the clean-up solvents shall be placed in closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

As derived from the "Preferred and Alternate Methods for Estimating Air Emissions from the Printing, Packaging, and Graphic Arts Industry"; Volume II; Chapter 15, May 2002, (see page 15.4-3) the following HAP and VOC emission factors (next page) shall be used in HAP and VOC

emissions formulas in (a), (b), (c).

Material	% Emission Factor
<u>Ink</u>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<u>Coatings</u>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

Compliance with the limits outlined in this table shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

<b>Material for Facilities P001, P002, P003, and P004</b>	<b>% Emission Factor</b>
<u>Ink</u>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<u>Coatings</u>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

**326 IAC 5-1 (Opacity Limitations)**

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

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

**State Rule Applicability - Individual Facilities**

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

- (a) The four (4) printing presses, identified as P001, P002, P003, and P004, are not subject to this rule because the flexographic coating method is a type of roll coating application

system and does not have particulate emissions, therefore, pursuant to 326 IAC 6-3-1(b)(6), the four (4) printing presses are exempt from the requirements of this rule.

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c), and 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. The trim collection system and the welding operation, both insignificant activities, are subject to this rule. PM emissions from these processes (trim collection and welding operations) shall not exceed 0.551 pounds per hour.

**326 IAC 8-1-6 (New Facilities; general reduction requirements)**

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). This source shall limit VOC emissions from each of the lithographic printing presses (P001, P002, P003 and P004) to less than twenty-five (25.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

This rule does not apply to the four (4) in-line flexographic coating units because these units are subject to 326 IAC 8-2-5 (Paper Coating Operations).

<b><i>Material for Facilities P001, P002, P003, and P004</i></b>	<b><i>% Emission Factor</i></b>
<u>Ink</u>	
Conventional	5%
Ultraviolet Cured	100%
Fountain Solution and Additives	100%
Cleaning Solutions	50%
<u>Coatings</u>	
Ultraviolet Cured	100%
Water-Based	100%
Conventional Varnish	5%

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

The four (4) in-line flexographic coating units of the printing presses identified as P001, P002, P003, and P004, are subject to the requirements of this rule because they perform web coating of paper with 100% saturation of the web, were constructed after July 1, 1990 and have actual VOC emissions of greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the four (4) in-line flexographic coating units shall not discharge into the atmosphere more than 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water, delivered to the applicator at each of the four (4) in-line flexographic coating units.

Based on the MSDS submitted by the source, the four (4) in-line flexographic coating units are able to comply with this requirement.

Compliance with the VOC content limit in 326 IAC 8-2-5 for the in-line flexographic coating unit, shall

be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis on days when non-compliant coatings are being used. The volume weighted average VOC content of all the coatings used on that unit, both compliant and noncompliant, shall be used to determine compliance with the limitation for that day for that unit. This volume weighted average shall be determined by the following equation:

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

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

This rule does not apply to the four (4) lithographic printing presses in the coating lines also identified as P001, P002, P003, and P004, because these units do not perform web coating or saturation processes.

#### 326 IAC 8-3-2 (Cold cleaner operation)

Pursuant to 326 IAC 8-3-1(a) (2), the parts washer, an insignificant activity, is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) since it was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-1(b) (2), 326 IAC 8-3-5 only applies to cold cleaner degreasers without a remote solvent reservoir. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

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

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The parts washer, an insignificant activity, is a cold cleaner type facility which does have a remote solvent reservoir. The parts washer is therefore, not subject to the operation and control provisions of 326 IAC 8-3-5.

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

The four (4) printing presses, identified as P001, P002, P003, and P004, are not subject to the requirements of this rule because they do not perform flexographic printing. The flexographic coating units coat the paperboard cartons utilizing a water based coating. Therefore, these facilities are not subject to the requirements of 326 IAC 8-5-5.

### Testing Requirements

There are no testing requirements applicable to this source. The previous approvals issued to this

source did not include any testing requirements.

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

This source will demonstrate compliance through record keeping and reporting. There are no other compliance requirements applicable to this source. The previous approvals issued to this source did not include any compliance requirements.

### **Conclusion**

The operation of this stationary paperboard folding carton operation shall be subject to the conditions of the attached proposed **(FESOP No.: F113-25199-00022)**.

**Appendix A: Potential Emissions Calculations Summary****Company Name: Graphic Packaging International****Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755****SIC Code: 2657****FESOP Renewal: F113-25199-00022****Reviewer: APT****Date: 1/9/2008****Total Potential To Emit (tons/year)**

## Emissions Generating Activity

Pollutant	Printing / Coating / Cleaning	Gluing	Space Heaters	Trimming	TOTAL
PM	0.00	0.00	0.08	60.07	60.15
PM10	0.00	0.00	0.33	60.07	60.40
SO2	0.00	0.00	0.03	-----	0.03
NOx	0.00	0.00	4.38	-----	4.38
VOC	>100.00	1.13	0.24	-----	>100.00
CO	0.00	0.00	3.68	-----	3.68
total HAPs	>25.00	0.94	0.16	-----	>25.00
worst case single HAP	>10.00	0.94	0.08	-----	>10.00
		Vinyl Acetate	Hexane	-----	

Total emissions based on rated capacities at 8,760 hours/year.

**Controlled Emissions (tons/year)**

## Emissions Generating Activity

Pollutant	Printing / Coating / Cleaning	Gluing	Space Heaters	Trimming	TOTAL
PM	0.00	0.00	0.08	0.60	0.68
PM10	0.00	0.00	0.33	0.60	0.93
SO2	0.00	0.00	0.03	-----	0.03
NOx	0.00	0.00	4.38	-----	4.38
VOC	98.40	1.13	0.24	-----	99.77
CO	0.00	0.00	3.68	-----	3.68
total HAPs	23.00	0.94	0.16	-----	24.11
worst case single HAP	8.90	0.94	0.08	-----	9.92
		Vinyl Acetate	Hexane		

Total emissions based on rated capacities at 8,760 hours/year.

**Appendix A: Emission Calculations**

**VOC and HAP Emissions**

**From Adhesive Use**

**Company Name: Graphic Packaging International**

**Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755**

**SIC Code: 2657**

**FESOP Renewal: F113-25199-00022**

**Reviewer: APT**

**Date: 1/9/2008**

Resin Adhesive Used	Density (lbs/gal)	Weight % VOC	Maximum Usage (gal/hr)	PTE of VOC (lbs/day)	PTE of VOCs (tons/yr)
R44603U	8.80	1%	4.90	6.2	1.1
<b>Total</b>					<b>1.1</b>

Resin Adhesive Used	Density (lbs/gal)	Weight % HAP	Maximum Usage (gal/hr)	PTE of HAP (lbs/day)	PTE of HAP (tons/yr)
R44603U	8.80	0.5%	4.90	5.2	0.9
<b>Total</b>					<b>0.9</b>

The only HAP contained in the adhesive R44603U is Vinyl Acetate (CAS# 108-05-4). Therefore, Combined and Single HAP values are the same.

**METHODOLOGY**

PTE of VOC (lbs/day) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/hr) x 24 hr/day

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/hr) x 8760 hr/yr x 1 ton/2000 lbs

PTE of HAP (lbs/day) = Density (lbs/gal) x Weight % HAP x Max. Usage (gal/hr) x 24 hr/day

PTE of HAP (tons/yr) = Density (lbs/gal) x Weight % HAP x Max. Usage (gal/hr) x 8760 hr/yr x 1 ton/2000 lbs

**VOCs**

90,000 lbs/yr x 1 gal/8.8 lbs = 10,227.27 gal/yr

10,227.27 gal/yr x 261 working days per year / 8 hrs per working day = 4.9 gal/hr

**HAPS**

90,000 lbs/yr x 1 gal/8.8 lbs = 10,227.27 gal/yr

10,227.27 gal/yr x 261 working days per year / 8 hrs per working day = 4.9 gal/hr

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: Graphic Packaging International**

**Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755**

**SIC Code: 2657**

**FESOP Renewal: F113-25199-00022**

**Reviewer: APT**

**Date: 1/9/2008**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

10.00

87.6

**Pollutant**

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.38	0.24	3.68

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	<b>Worst Case Single HAP</b>
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04	Hexane 0.08

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel	<b>Combined HAPs (tpy)</b>
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05	0.16

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Potential Emissions Calculations**

**Trimming Operations**

**PM/PM-10 Emissions**

**Company Name: Graphic Packaging International**

**Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755**

**SIC Code: 2657**

**FESOP Renewal: F113-25199-00022**

**Reviewer: APT**

**Date: 1/9/2008**

<b>1. Process Description:</b>	
Primary PM Control Equipment:	
Outlet Grain Loading:	0.01 grains/acf
Air Flow Rate:	1,600 acfm
Control Efficiency:	99.0%
<b>2. Potential to Emit After Control:</b>	
Controlled Hourly PM/PM-10 Emissions = grain loading (gr/acf) x air flow rate (acfm) x 60 min/hr x 1lb/7,000 grains =	0.14 lbs/hr
Controlled PM/PM-10 Emissions = grain loading (gr/acf) x air flow rate (acfm) x 60 min/hr x 1lb/7,000 grains x 8,760 hrs/yr x 1 ton/2,000 lbs =	0.60 tons/yr
Note: All PM emissions are assumed equal to PM-10 emissions.	
<b>3. Potential Uncontrolled Emissions:</b>	
Potential PM/PM-10 Emissions = Controlled PM/PM-10 Emissions (tons/yr) / (1 - Control Efficiency) =	60.07 tons/yr
	13.71 lbs/hr