



DATE: June 18, 2008

TO: Interested Parties / Applicant

RE: TIN Inc., d/b/a Temple-Inland / M097-25713-00154

FROM: Timothy J. Method

Environmental Coordinator

CERTIFIED MAIL 7007 07100005 3966 2269

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



**Minor Source Operating Permit Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
AND OFFICE OF ENVIRONMENTAL SERVICES**

**TIN Inc., d/b/a Temple-Inland
7536 Miles Drive
Indianapolis, Indiana 46231**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Permit Renewal No.: M097-25713-00154	
Issued by: ORIGINAL SIGNED BY Timothy J. Method Environmental Coordinator Department of Public Works	Issuance Date: June 18, 2008 Expiration Date: June 18, 2018



**Department of Public Works
Office of Environmental Services**
2700 Belmont Avenue | 317-327-2234
Indianapolis, IN 46221 | Fax 327-2274
TDD 327-5186
indygov.org/dpw

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary flexographic printing press operation.

Source Address:	7536 Miles Drive, Indianapolis, Indiana 46231
Mailing Address:	7536 Miles Drive, Indianapolis, Indiana 46231
General Source Phone Number:	(317) 481-4000
SIC Code:	2759, 2796
County Location:	Marion
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset 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

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

- (a) One (1) Fischer & Krecke flexographic printing press, 10-Color, identified as Emission Unit (EU) - 001, performing a continuous operation, installed in 1992, with a maximum line speed of 1,300 linear feet per minute (ft/min), a maximum print width of 96 inches (in), and exhausting to three (3) vents/stacks identified as S-01, S-02, and S-03.
- (b) Three (3) natural gas fired dryers (EU-002), part of the flexographic printing press operation for drying the coating as applied to the substrate, installed in 1992; two (2) with a maximum capacity of 2.5 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr), each exhausting to separate stacks identified as S-01, S-02, and S-03.
- (c) One (1) 3002i DuPont Plate Making equipment (EU-003) performing a batch operation, installed in 1998, with a maximum operating capacity of 365,000 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-04.
- (d) One (1) DuPont Plate Making Fast Unit equipment (EU-005), model number 4260 TD, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-05.
- (e) One (1) DuPont UV Light Finisher equipment (EU-006), model number 2000 ECLF, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year, and exhausting to one (1) stack identified as S-06.

- (f) Natural gas fired indirect heating combustion emission units, with a heat input equal to or less than ten million (10,000,000) Btu per hour, constructed in 1992, and exhausting to stack S-02.
 - (1) Two (2) roof top units, 0.235 and 0.5 MMBtu/hr;
 - (2) One (1) mini boiler 0.193 MMBtu/hr;
 - (3) One (1) water boiler, 0.27 MMBtu/hr;
 - (4) Two (2) water heaters, 0.09 and 0.27 MMBtu/hr; and
 - (5) Four (4) small heaters, 0.8 MMBtu/hr.

- (g) A variety of trivial activities as defined in 326 IAC 2-7-1(40) relating to: ventilation, routine fabrication such as drilling, surface grinding as related to maintenance and repair, housekeeping, office related activities, sampling activities such as waste, storage equipment containing raw materials, emergency and standby equipment such as process safety valve relief devices, activities related to production such as air compressors & pneumatically operated equipment, cleaners and solvents with vapor pressure less than 2 kPa, activities associated with treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (1) activities associated with degreasing operations that do not exceed 145 gallons per twelve months.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-25713-00154, 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 and OES, 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

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

B.5 Severability

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

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES 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 and OES 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

- (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 Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES.

IDEM, OAQ and OES 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M097-25713-00154 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days 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 and OES 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 2-6.1 until IDEM, OAQ and OES 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 and OES any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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, and OES or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 317-327-2234 (ask for OES Air Compliance), to determine the appropriate permit fee.

B.19 Credible Evidence [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 2-6.1-5(a)(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(c)]

Pursuant to 326 IAC 6-3-2(c), particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

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 thirty percent (30%) 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]

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 IDEM Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

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

All required notifications shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Enforcement Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 and OES 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 and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES if the Permittee submits to IDEM, OAQ and OES 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]

The IDEM Commissioner and OES Administrator 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 IDEM Commissioner, OES Administrator or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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]

- (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 and OES 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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and OES, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and OES that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ and OES may extend the retesting deadline.
- (c) IDEM, OAQ and OES 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 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), the City of Indianapolis, Office of Environmental Services (OES), and U.S. EPA or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to IDEM, OAQ and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM or OES 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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
- (c) 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).
- (d) 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.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) One (1) Fischer & Krecke flexographic printing press, 10-Color, identified as Emission Unit (EU) - 001, performing a continuous operation, with a maximum line speed of 1,300 linear feet per minute (ft/min), a maximum print width of 96 inches (in), installed in 1992, and exhausting to three (3) vent/stacks, identified as S-01, S-02, and S-03.
- (c) One (1) 3002i DuPont Plate Making equipment (EU-003) performing a batch operation, installed in 1998, with a maximum operating capacity of 365,000 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-04.
- (d) One (1) DuPont Plate Making Fast Unit equipment (EU-005), model number 4260 TD, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-05.
- (e) One (1) DuPont UV Light Finisher equipment (EU-006), model number 2000 ECLF, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year, and exhausting to one (1) stack identified as S-06.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5][326 IAC 2-2]

Pursuant to 326 IAC 8-5-5(c)(4), the Permittee may not cause, allow, or permit the operation of flexographic printing presses and any associated equipment utilizing solvent containing ink unless, the ink as applied to the substrate meets the emission limit of 0.5 pound of VOC per pound of solids in the ink.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds [326 IAC 8-1-10][326 IAC 8-1-2][326 IAC 8-1-4]

- (a) Pursuant to 326 IAC 326 IAC 8-1-10(a) and (b), the Permittee shall utilize the compliance methods specified in the aforementioned regulations.
- (b) Pursuant to 326 IAC 8-1-2(a)(3) and emission limitations contained in Condition D.1.1, a certificate of compliance with the VOC content and usage limitations shall be prepared by utilizing supplied coating manufacturer formulation data meeting testing procedures specified under 326 IAC 8-1-4 (k),(l), and (m).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)][326 IAC 8-1-10]

D.1.4 Record Keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c), the Permittee shall document compliance with D.1.1 by maintaining records and certifying compliance in accordance with (b) and (c) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

- (1) The name and identification number of each coating, ink and solvent, as applied.
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating, ink, and solvent for each coating, ink, and solvent as applied, or the VOC content of each coating, ink and solvent as applied, expressed in pound of VOC per pound of solids in the coating, ink and solvent.
 - (3) As new compliant coatings, inks, and solvents are added to the facility, the records shall be updated to incorporate the new additions.
 - (4) If use of a coating, ink and solvent is discontinued, the records required by 326 IAC 8-1-10 shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The Permittee shall certify to the department that the coating facility is in compliance with 326 IAC 8-1-10(b), upon startup of a new coating facility (emission unit) or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coating. The certification shall include the following:
- (1) The name and location of the source.
 - (2) The name, address, and telephone number of the person responsible for the source.
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.
 - (4) The name and identification number of each coating, as applied, used at each coating facility.
 - (5) The mass of VOC (excluding water and exempted compounds) per volume of coating for each coating, as applied.
- (c) The Permittee shall notify the department in either of the following instances:
- (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to the department within thirty (30) days following use; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Time, date, and duration of the noncompliance.
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of 326 IAC 8-1-11(b) or 326 IAC 8-1-12(b), respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of 326 IAC 8-1-11 or 326 IAC 8-1-12, respectively.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (b) Three (3) natural gas fired dryers (EU-002), part of the flexographic printing press operation for drying the coating as applied to the substrate, installed in 1992; two (2) with a maximum capacity of 2.5 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr), each exhausting to separate stacks identified as S-01, S-02, and S-03.
- (f) Natural gas fired indirect heating combustion emission units, with a heat input equal to or less than ten million (10,000,000) Btu per hour, constructed in 1992, and exhausting to stack S-02.
 - (1) Two (2) roof top units, 0.235 and 0.5 MMBtu/hr;
 - (2) One (1) mini boiler 0.193 MMBtu/hr;
 - (3) One (1) water boiler, 0.27 MMBtu/hr;
 - (4) Two (2) water heaters, 0.09 and 0.27 MMBtu/hr; and
 - (5) Four (4) small heaters, 0.8 MMBtu/hr.
- (g) A variety of trivial activities as defined in 326 IAC 2-7-1(40) relating to: ventilation, routine fabrication such as drilling, surface grinding as related to maintenance and repair, housekeeping, office related activities, sampling activities such as waste, storage equipment containing raw materials, emergency and standby equipment such as process safety valve relief devices, activities related to production such as air compressors & pneumatically operated equipment, cleaners and solvents with vapor pressure less than 2 kPa, activities associated with treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (1) activities associated with degreasing operations that do not exceed 145 gallons per twelve months.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate Matter [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the total particulate matter emissions specified in 326 IAC 6-2-1 (d) from the boilers and other indirect combustion emission units as specified in the table above (2.358 MMBtu/hr) and constructed after September 21, 1983, shall be limited to 0.6 pounds per MMBtu heat input.

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(2)]

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;

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

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OES
AIR COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Company Name:	TIN Inc., dba Temple-Inland
Address:	7536 Miles Drive
City:	Indianapolis, Indiana 46231
Phone #:	(317) 481-4000
MSOP #:	M097-25713-00154

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 Notification
- 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
and
INDIANAPOLIS OES
AIR COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	TIN Inc., dba Temple-Inland
Address:	7536 Miles Drive
City:	Indianapolis, Indiana 46231
Phone #:	(317) 481-4000
MSOP #:	M097-25713-00154

I hereby certify that TIN Inc., dba Temple-Inland is :

still in operation.

no longer in operation.

I hereby certify that TIN Inc., dba Temple-Inland is :

in compliance with the requirements of MSOP M097-25713-00154.

not in compliance with the requirements of MSOP M097-25713-00154.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
FAX NUMBER - 317 327-2274**

PAGE 1 OF 2

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

PAGE 2 OF 2

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	TIN Inc., d/b/a Temple-Inland
Source Location:	7536 Miles Drive, Indianapolis, IN 46231
County:	Marion
SIC Code:	2759, 2796
Permit Renewal No.:	M097-25713-00154
Permit Reviewer:	Carmen Bugay

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES), have reviewed the operating permit renewal application from TIN Inc., d/b/a Temple-Inland, relating to the operation of a stationary flexographic printing press and associated equipment.

History

On December 18, 2007 and January 17, 2008, TIN Inc., d/b/a Temple-Inland, submitted a complete application to the OES and IDEM, OAQ requesting a renewal of its operating permit, M097-15453-00154, which was issued on April 1, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) Fischer & Krecke flexographic printing press, 10-Color, identified as Emission Unit (EU) - 001, performing a continuous operation, installed in 1992, with a maximum line speed of 1,300 linear feet per minute (ft/min), a maximum print width of 96 inches (in), and exhausting to three (3) vents/stacks identified as S-01, S-02, and S-03.
- (b) Three (3) natural gas fired dryers (EU-002), part of the flexographic printing press operation for drying the coating as applied to the substrate, installed in 1992; two (2) with a maximum capacity of 2.5 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr), each exhausting to separate stacks identified as S-01, S-02, and S-03.
- (c) One (1) 3002i DuPont Plate Making equipment (EU-003) performing a batch operation, installed in 1998, with a maximum operating capacity of 365,000 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-04.
- (d) One (1) DuPont Plate Making Fast Unit equipment (EU-005), model number 4260 TD, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year (sq ft/yr), and exhausting to one (1) stack identified as S-05.

- (e) One (1) DuPont UV Light Finisher equipment (EU-006), model number 2000 ECLF, performing a batch operation, installed in 2005, with a maximum operating capacity of 229,950 square feet per year, and exhausting to one (1) stack identified as S-06.
- (f) Natural gas fired space heaters, process heaters, or boilers with a heat input equal to or less than ten million (10,000,000) Btu per hour, constructed in 1992, and exhausting to stack S-02.
 - (1) Two (2) roof top units, 0.235 and 0.5 MMBtu/hr;
 - (2) One (1) mini boiler 0.193 MMBtu/hr;
 - (3) One (1) water boiler, 0.27 MMBtu/hr;
 - (4) Two (2) water heaters, 0.09 and 0.27 MMBtu/hr; and
 - (5) Four (4) small heaters, 0.8 MMBtu/hr.
- (g) A variety of trivial activities as defined in 326 IAC 2-7-1(40) relating to: ventilation, routine fabrication such as drilling, surface grinding as related to maintenance and repair, housekeeping, office related activities, sampling activities such as waste, storage equipment containing raw materials, emergency and standby equipment such as process safety valve relief devices, activities related to production such as air compressors & pneumatically operated equipment, cleaners and solvents with vapor pressure less than 2 kPa, activities associated with treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (1) activities associated with degreasing operations that do not exceed 145 gallons per twelve months.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

None at the source.

Existing Approvals

Since the issuance of the MSOP (097-15453-00154) on April 1, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Permit Revision No. 097-18989-00154, issued on July 7, 2004; and
- (b) Notice-Only-Change No. 097-21567-00154, issued on October 5, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this MSOP Renewal:

- (a) Condition A.2 - Descriptive information of the operating permit M097-15453-00154 in regards to Emission Unit (EU) 001, has been changed from the incorrectly typed number of three (3) flexographic presses to reflect one (1) flexographic press, and all other emission unit descriptive information has been revised.

The following have been added in this MSOP Renewal:

- (a) Regulation 326 IAC 8-5-5 and applicable requirements have been added and are reflected in Section D.1.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

The emission calculations are provided in Appendix A (pages 1-7) of this document.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

Note¹: Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X2*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM2.5.

(a) Ozone Standards:

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Marion County as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.02
PM ₁₀	0.08
SO ₂	0.01
NOx	1.03
VOC	81.29
CO	0.87

HAPs	tons/year
1) Printing Operation (Op)	
Styrene	0.005
Diethanolamine	0.008
Acrylic Acid	0.029
(2-Ehoxyethoxy) Ethanol	0.083
Ethylene Glycol ¹	0.003
Cyclo Hexane-highest worst case single HAP	0.81
Toluene	0.016
TOTAL Printing Op	0.96
2) Parts washer Op	
Tetrachloroethylene	0.001
Diethylene Glycol Monobutyl Ether	0.179
3) Combustion Op	
Total Ops: HAPs (combined)	0.99

Note¹: Manufacturer % content of ethylene glycol is proprietary and could not be obtained or verified by the source, therefore they could not be taken off the HAP list and were counted in the total HAP number.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Volatile Organic Compounds (VOC), is greater than or equal to twenty-five (25) tons per year (tpy) and less than one hundred (100) tpy. The PTE of all other criteria pollutants are less than twenty-five (25) tpy. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of PSD applicability under 326 IAC 2-2.

Federal Rule Applicability

- (a) Because the source does not use rotogravure printing, the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR 60, Subpart QQ, is not included in this permit renewal.
- (b) There are no other NSPS (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.
- (c) The source does not meet the definition of a major source of hazardous air pollutants HAPs), as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK (National Emissions Standards for the Printing and Publishing Industry) and 40 CFR Part 63 Subpart JJJJ (National Emissions Standard for Paper and Other Web Surface Coating Operations). In addition, none of the solvents used by the parts washer permitted by this minor source operating permit contain any of the constituents listed in 40 CFR 63.460(a), 40 CFR 63 Subpart T. Therefore, this NESHAP is not included in this permit renewal.
- (d) There are no other NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (e) 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in this permit renewal, because the unlimited potential to emit is less than Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM-10 (as surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

The existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements are not included in this permit renewal.

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

This source is not a major source of HAPs and will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Marion County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source does not generate fugitive emissions, and is not located in portions of Marion County designated as nonattainment for particulate matter, therefore this regulation is not included in this permit renewal.

326 IAC 6-5.1-1 (Particulate Matter Limitations Except Lake County)

Although the source is located in Marion County, it does not have the potential to emit 100 tons per year or greater of particulate matter, and/or actual emissions of 10 tons or more per year of particulate matter. In addition, the source is not one of the sources listed in 326 IAC 6.5-6 (formerly 326 IAC 6-1-12); therefore, 326 IAC 6.5-1-1 (formerly 6-1), does not apply.

326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain coating Facilities Using Compliant Coatings)

Pursuant to 326 IAC 8-1-10(a) and (b), this rule applies to sources that use compliant coatings to comply with VOC emissions limits and meet any of the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Pursuant to 326 IAC 8-1-10(c), the source shall collect and maintain daily records of the mass of VOC per volume of coating, ink and solvent, expressed in pound of VOC per pound of solids in the coating, ink and solvent. Pursuant to 326 IAC 8-1-10(d), the source shall notify IDEM, OAQ and OES within 30 days and also submit with the quarterly compliance report, if noncompliant coatings are utilized.

Since this source meets the applicability criteria under 326 IAC 8-5-5(a)(2), and will use compliant coatings to comply with the VOC emission limit as specified in 326 IAC 8-5-5(c)(4), the source shall comply with the certification, record keeping, reporting, and notification requirements of this rule.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to existing sources as of January 1, 1980, located in Marion County, with VOC potential emissions of 100 tpy or more, and not regulated by any other provisions of Article 8. This source commenced operation after January 1, 1980 (1991), has potential VOC emissions of less than 100 tpy, and is regulated by another provision of Article 8. Therefore, this regulation does not apply.

State Rule Applicability - Individual Facilities:

a) EU-001 (Kreckle flexographic printing press):

326 IAC 6-3 (Particulate Emission Limitations)

The source has potential particulate matter emissions less than five hundred fifty-one thousandths (0.551) pound per hour; therefore, pursuant to 326 IAC 6-3-1(b)(14), this source is exempt from this rule.

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

EU-001 has a VOC potential to emit greater than 25 tons per year (tpy), but is subject to other provisions of Article 8 (326 IAC 8-5-5); therefore, this regulation does not apply.

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

Even though EU-001 was constructed after July 1, 1990, the flexographic printing process is not web coating and does not involve 100% saturation of substrate, and it is regulated by other provisions of Article 8 (326 IAC 8-5-5); therefore, it is not subject to this regulation.

326 IAC 8-5 (Miscellaneous Operations)

Pursuant to 326 IAC 8-5-1(2), flexographic printing sources constructed after November 1, 1980 located anywhere in the state with source-wide potential to emit (PTE) greater than or equal to twenty-five (25) tons per year of VOC, shall be regulated by 326 IAC 8-5-5 (Graphic Arts Operations).

Pursuant to 326 IAC 8-5-5 (c), no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
- (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material;
- (c) the owner or operator installs and operates:
 - (1) a carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight;
 - (2) an incineration system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water; or
 - (3) an alternative volatile organic compound emission reduction system demonstrated to have at least a ninety percent (90%) reduction efficiency, measured across the control system, and has been approved by the IDEM Commissioner; or
 - (4) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.

The coatings utilized source-wide shall contain less than 0.5 pound of VOC per pound of solids in the ink as applied to the substrate, as specified in 326 IAC 8-5-5(c)(4); therefore, this source shall comply with 326 IAC 8-5-5.

b) EU-002 - Three (3) Gas Dryers:

326 IAC 6-2-4 (Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d)),

This regulation refers to particulate mater from indirect heating facilities. Since the dryers are direct heating combustion units (facilities) not indirect, therefore 326 IAC 6-2-4 is not included in this permit renewal.

c) EU-003 - Dupont Platemaking Equipment:

326 IAC 6-3-1 (Particulate Emission Limitations)

The source has potential particulate matter emissions less than five hundred fifty-one thousandths (0.551) pound per hour; therefore, pursuant to 326 IAC 6-3-1(b)(14), this source is exempt from this rule.

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

EU-003 is part of the pre-printing batch operation. This operation generates heat during the etching/curing phase while the printing plates are being made. Small amounts of ink are utilized in this phase. The ink utilized in EU-003 has a VOC potential to emit of less than 25 tons per year (tpy), and the source is subject to other provisions of Article 8 (326 IAC 8-5-5); therefore, this regulation is not included in this permit renewal.

d) EU-005 DuPont 4260TD Fast Unit:

326 IAC 6-3 (Particulate Emission Limitations)

The source has potential particulate matter emissions less than five hundred fifty-one thousandths (0.551) pound per hour; therefore, pursuant to 326 IAC 6-3-1(b)(14), this source is exempt from this rule.

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

EU-005 is part of the pre-printing batch operation. This operation generates heat during the etching/curing phase while the printing plates are being made. Small amounts of ink are utilized in this phase. The ink utilized in EU-005 has a VOC potential to emit of less than 25 tons per year (tpy), and the source is subject to other provisions of Article 8 (326 IAC 8-5-5); therefore, this regulation is not included in this permit renewal.

e) EU-006 - Light Finisher:

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

EU-006 is part of the pre-printing batch operation. This operation generates small amounts of heat during the U.V. etching/curing phase while the printing plates are being made. No ink is utilized in this phase, therefore, this regulation is not included in this permit renewal.

f) EU-007 - Parts Washer:

326 IAC 8-3 (Volatile Organic Compound Rules: Organic Solvent Degreasing Operations)

Pursuant to 8-3-1(a)(2), this regulation applies to new facilities (emission units) after January 1, 1980, that perform organic solvent degreasing operations.

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

Pursuant to 8-3-2, the owner or operator of a cold cleaning facility 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)

Pursuant to 8-3-5, the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) the solvent is agitated; or
 - (3) the solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 8-3-5, the owner or operator of a cold cleaner degreaser facility shall ensure that the following operating requirements are met:

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

g) Boilers, Space Heaters & Process Heaters:

326 IAC 6-2-4 (Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d)) Pursuant to 326 IAC 6-2-4(a), the total particulate matter emissions specified in 326 IAC 6-2-1(d) from the boilers and other combustion units (2.358 MMBtu/hr) utilized for indirect heating purposes and constructed after September 21, 1983, shall be limited to 0.6 pounds per MMBtu heat input, since the total source maximum operating capacity rating is less than 10 MMBtu/hr.

The source will be able to comply with this limit, since the potential to emit particulate emissions from the indirect heating units are 0.002 lb/MMBtu.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance monitoring requirements applicable to this source are as follows:

- (a) In order for the source to demonstrate compliance with the VOC content and usage limitations of 0.5 pound of VOC per one (1) pound of solids in the ink pursuant to 326 IAC 8-5-5(c)(4), the limit shall be determined in accordance with 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility, the owner or operator of the source identified in subsection (a) shall certify to the department that the coating facility is in compliance with this section. The certification shall include the following:
 - (1) The name and location of the source.
 - (2) The name, address, and telephone number of the person responsible for the source.
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.
 - (4) The name and identification number of each coating, as applied, used at each coating facility.

- (5) The mass of VOC (excluding water and exempted compounds) per volume of coating for each coating, as applied.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

A complete application for the purposes of this review was received on December 18, 2007 and January 17, 2008. Additional information was received on January 9, 15, February 7, 8, 11, 14, 20, and 25, 2008.

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

Conclusion

The operation of this stationary flexographic printing press operation and associated equipment, shall be subject to the conditions of the attached MSOP Renewal No. M097-25713-00154.

Appendix A: Emissions Calculations
EMISSION CALCULATIONS
 Printing Operations

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
 MSOP Renewal No. : 097-25713-00154
 Submitted by : TIN Inc. d/b/a Tr
 Reviewer : Carmen Bugay
 Date : 1/25/08

1) FLEXOGRAPHIC PRINTING OPERATIONS: CONTINUOUS PROCESS

THROUGHPUT			
Press ID:	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MM in^2/YEAR
EU-001 Flexo Printing Press	1,300.00	96	787,138.56

PTE's for VOC's	Maximum Coverage (lbs/MMin^2)	Weight % VOC**	Flash Off %	Throughput (MMin2/yr)	Pounds of Ink/yr	EMISSIONS (tons/yr)
Inks:	5	3.99%	100.00%	787,138.56	3,935,693	78.44

PTE's for HAP's	Maximum Coverage (lbs/Mmin^2)	Weight % HAP	Flash Off %	Throughput (lbs/yr)	EMISSIONS (tons/yr)
Inks:	5				
Styrene		0.0002%	100%	3,935,693	0.005
Diethanolamine		0.0004%	100%	3,935,693	0.008
Acrylic Acid		0.0015%	100%	3,935,693	0.029
(2-Ethoxyethoxy) ethanol		0.0042%	100%	3,935,693	0.083
Ethylene Glycol		0.0002%	100%	3,935,693	0.003
					0.128

*Note: Manufacturer % content of ethylene glycol is proprietary and could not be obtained or verified by the source therefore they could not be taken off the HAP list and were counted in the total HAP number.

Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC/HAP Emissions (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2,000 pounds

Appendix A: Emissions Calculations
EMISSION CALCULATIONS
 Printing Operations

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
 MSOP Renewal No. : 097-25713-00154
 Submitted by : TIN Inc. d/b/a Tr
 Reviewer : Carmen Bugay
 Date: 1/25/08

2) PRE-PRINTING PLATE OPERATIONS: BATCH PROCESS

THROUGHPUT	Max Image (Plate) Size (inches)		Total Square Inches	Total Square Feet	Maximum Plates per Day	Maximum (Plates) Square Feet per Day	Days per Year	Maximum (Plates) Square Feet per Year	Maximum Ink Coverage of Plate - Emission Factor from Supplier (lbs/sf)	Total Uncontrolled (PTE) VOC emissions (tons per yr)
EU-003 DuPont Platemaker	50	80	4,000.00	27.778	36	1,000.00	365	365,000.00	0.0088	1.606

Total Emissions (VOC/HAPs)	VOC content of ink	Potential to Emit (PTE) (lbs/yr)	PTE of VOC in ink (tons/yr)	PTE of HAP in ink (tons/yr)
Acrylate Monomers	34.16%	1,097	0.549	
Aromatic Hydrocarbon	27.95%	898	0.449	
BHT (Butylated hydroxytoluene) CAS# 128-37-0	6.21%	199	0.100	
Cyclohexane (HAP) CAS# 110-82-7	31.06%	998	0.499	0.499
Toluene (HAP) CAS# 108-88-3	0.62%	20	0.010	0.010
Total	100%	3,212	1.606	0.509

Methodology:

Potential to Emit (tons/yr) = VOC/HAP content of ink (%) x 365,000 (max sq. ft/yr) x maximum coverage (0.0088 lbs of ink /sq. ft)/2,000 lbs/ton

Appendix A: Emissions Calculations
EMISSION CALCULATIONS
 Printing Operations

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
 MSOP Renewal No. : 097-25713-00154
 Submitted by : TIN Inc. d/b/a Tr
 Reviewer : Carmen Bugay
 Date: 1/25/08

THROUGHPUT	Max (Plate) Image Size (Inches)		Total Square Inches	Total Square Feet	Maximum Plates per Day	Maximum Square Feet per Day	Days per Year	Maximum Square Feet per Year	Maximum Ink Coverage of Plate - Emission Factor from Supplier (lbs/sf)	Total Uncontrolled (PTE) VOC emissions (tons per yr)
EU-005 DuPont Platemaker 4260 TD	42	60	2,520.00	17.5	36	630.00	365	229,950.00	0.0088	1.012

Total Emissions	VOC content of ink	Potential to Emit (PTE) in ton/yr	PTE of VOC in ink (tons/yr)	PTE of HAP in ink (tons/yr)
Acrylate Monomers	34.16%	691	0.346	
Aromatic Hydrocarbon	27.95%	566	0.283	
BHT (Butylated hydroxytoluene)	6.21%	126	0.063	
Cyclohexane (HAP)	31.06%	629	0.314	0.314
CAS# 110-82-7				
Toluene (HAP)	0.62%	13	0.006	0.006
CAS# 108-88-3				
	100%	2,024	1.012	0.321

THROUGHPUT	Max (Plate) Image Size (Inches)		Total Square Inches	Total Square Feet	Maximum Plates per Day	Maximum Square Feet per Day	Days per Year	Maximum Square Feet per Year	Maximum Ink Coverage of Plate - Emission Factor from Supplier (lbs/sf)	Total Uncontrolled (PTE) VOC emissions (tons per yr)
EU-006 DuPont Lightfinisher 2000 ECLF	42	60	2,520.00	17.5	36	630.00	365	229,950.00	0.0000	0.000

Emission numbers calculated on the following PTE worst-case (EU-001)		
Potential Pounds of Ink	3,935,692.80	
Actual 2006	553,355	(276.68 tpy)

Methodology:

Potential to Emit (tons/yr) = VOC/HAP content of ink (%) x 229,950 (max sq. ft/yr) x maximum coverage (0.0088 lbs of ink /sq. ft)/2,000 lbs/ton

VOC/HAP Emissions (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2,000 pounds

**Appendix A: Emissions Calculations
Combustion Operations - Natural Gas Only
MM BTU/HR <100**

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
MSOP Renewal No. : 097-25713-00154
Submitted by : TIN Inc. d/b/a Temple-Inland
Reviewer : Carmen Bugay
Date: 1/25/08

EU-002: Natural Gas Combustion

Natural Gas Units (MMBtu/hr)										
Dryer#1 *	Dryer #2 *	Dryer #3 *	Roof Top #1	Roof Top#2	Mini boiler	Water boiler	Water heater	4 small heaters	Water heater	TOTAL
8	2.5	2.5	0.235	0.5	0.193	0.27	0.09	0.8	0.27	2.358

Heat Input Capacity MMBtu/hr	Potential Throughput MMcf/yr					
2.358 *	20.66					
Pollutant						
Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emissions in tons/yr	0.0196	0.0785	0.0062	1.0328	0.0568	0.8676

* Note: the dryers are not considered in the 326 IAC 6-2-4 compliance applicability determination, since not indirect heating sources.

METHODOLOGY

326 IAC 6-2-4

$$0.0196 \text{ ton/yr} \times 2,000 \text{ lb/ton} / (8,760 \text{ hr/yr} \times 2.358 \text{ MMBtu/hr}) = \mathbf{0.002} \text{ lb/MMBtu}$$

Emission Factors:

- 1) All emission factors are based on normal firing.
 - a) MMBtu = 1,000,000 Btu
 - b) MMcf = 1,000,000 Cubic Feet of Gas
- 2) 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)

Potential Throughput:

$$3) \text{ Potential Throughput (MMCF)} = \text{Heat Input Capacity (MMBtu/hr)} \times 8,760 \text{ hrs/yr} \times 1 \text{ MMCF/1,000 MMBtu}$$

Emissions:

$$4) \text{ Emission (tons/yr)} = \text{Throughput (MMCF/yr)} \times \text{Emission Factor (lb/MMCF)} / 2,000 \text{ lb/ton}$$

See page 5 for HAP calculations.

**Appendix A: Emissions Calculations
Combustion Operations - Natural Gas Only
MM BTU/HR <100**

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
MSOP Renewal No. : 097-25713-00154
Submitted by : TIN Inc. d/b/a Temple-Inland
Reviewer : Carmen Bugay
Date: 1/25/08

EU-002: Natural Gas Combustion

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMcf/yr
2.358	20.66

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/MMcf	0.000200	0.000012	0.001100	0.001400	0.000000
Potential Emission in tons/yr	0.000002	0.000000	0.000011	0.000014	0.000000

HAPs - Metals

	Mercury	Manganese	Nickel	Selenium	Total HAPs
Emission Factor in lb/MMcf	0.000260	0.000380	0.002100	0.000024	Metals
Potential Emission in tons/yr	0.000003	0.000004	0.000022	0.000000	0.000057

HAPs - Organics

	Methylnaphthale	3-Methyl-chloranthrene	7,12-Dimethylbenz(a)anthracene	Acenaphthene	Acenaphthylene
Emission Factor in lb/MMcf	0.000024	0.000002	0.000002	0.000002	0.000002
Potential Emission in tons/yr	0.000000	0.000000	0.000000	0.000000	0.000000

HAPs - Organics

	Anthracene	Benz(a)anthracene	Benzene	Benzo(a)pyrene	Benzo(b)flouranthene
Emission Factor in lb/MMcf	0.000002	0.000002	0.002100	0.000001	0.000002
Potential Emission in tons/yr	0.000000	0.000000	0.000022	0.000000	0.000000

HAPs - Organics

	Benzo(g,h,i,)perylene	Benzo(k)flouranthene	Chysene	Dibenzo(a,h)anthracene	Dichlorobenzene
Emission Factor in lb/MMcf	0.000001	0.000002	0.000002	0.000001	0.001200
Potential Emission in tons/yr	0.000000	0.000000	0.000000	0.000000	0.000012

HAPs - Organics

	Flouranthene	Fluorene	Formaldehyde	Hexane	Indeno(1,2,3cd)pyrene
Emission Factor in lb/MMcf	0.000003	0.000003	0.000008	1.800000	0.000002
Potential Emission in tons/yr	0.000000	0.000000	0.000000	0.018590	0.000000

HAPs - Organics

	Naphthalene	Phenanathrene	Pyrene	Toluene	Total HAPs
Emission Factor in lb/MMcf	0.000610	0.000017	0.000005	0.003400	
Potential Emission in tons/yr	0.000006	0.000000	0.000000	0.000035	0.018667

METHODOLOGY is the same as page 4.

**Appendix A: Emission Calculations
Parts Washer**

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231

MSOP Renewal No. : 097-25713-00154

Submitted by : TIN Inc. d/b/a Temple-Inland

Reviewer : Carmen Bugay

Date: 1/25/08

EU-007

					Petroleum Naptha	
Parts Washer from Heritage-Crystal Clean		Size (gallons)	Max Potential Quantity Loss/ yr		Percent	lbs
- Crystal Clean 100+		30	30	6.54 lbs / gal	100%	196.20000
					0%	0.00000

					Tetrachloroethylene		1,1-Dichloro-1-Fluoroethane		Diethylene Glycol Monobutyl Ether	
Maintenance		Size (ounces)	Quantity / yr		Percent	lbs	Percent	lbs	Percent	lbs
- Solv	Aerosal	12	108	13.43 lbs / gal	95%	9.62	0%	0.00	0%	0.00
- Contact Cleaner	Aerosal	12	324	13.43 lbs / gal	0%	0.00	95%	28.86	5%	1.52
				0.00 lbs / gal	5%	0.00	0%	0.00	0%	0.00
				0.00 lbs / gal	0%	0.00	0%	0.00	0%	0.00
				0.00 lbs / gal	10%	0.00	0%	0.00	10%	0.00
				0.00 lbs / gal	0%	0.00	0%	0.00	0%	0.00
				0.00 lbs / gal	0%	0.00	0%	0.00	0%	0.00
				0.00 lbs / gal	0%	0.00	0%	0.00	0%	0.00
						9.62		28.86		1.52

Total VOC Run days in 2006
197.72 200

PTE VOC (Tons)
0.180

Total HAP Run days in 2006
39.99 200

PTE HAP (Tons)
0.036

**Appendix A: Emission Calculations
SUMMARY**

Address City IN Zip : 7536 Miles Drive, Indianapolis, IN 46231
 MSOP Renewal No. : 097-25713-00154
 Submitted by : TIN Inc. d/b/a Temple-Inland
 Reviewer : Carmen Bugay
 Date: 1/25/08

Source-wide PTE by Pollutant

Pollutant	Emissions Generating Activity in (tons/year)			
	Natural Gas Combustion	Printing Operations	Insignificant Activities	TOTAL EMISSIONS
PM	0.020			0.02
PM10	0.078			0.08
SO2	0.006			0.01
NOx	1.033			1.03
VOC	0.057	81.06	0.180	81.29
CO	0.868			0.87
total all HAPs	0.019	0.96	0.036	1.01
worst case single HAP	0.019	0.81		0.81
	(Hexane)	(Cyclohexane)		