



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 17, 2009

RE: Shorewood Packaging Corporation of Indiana / 097-26040-00107

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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

**Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, Indiana 46221**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

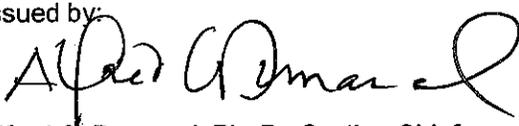
Operation Permit No.: F097-26040-00107	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 17, 2009 Expiration Date: April 17, 2019

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	7
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	16
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 2-2]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Volatile Organic Compounds (VOC)

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

- D.1.5 Record Keeping Requirement
- D.1.6 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 25

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

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

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 26

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

- D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

D.4. EMISSIONS UNIT OPERATION CONDITIONS..... 27

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

- D.4.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Certification Form 28
Emergency Occurrence Form 29
Quarterly Report Form 31
Quarterly Deviation and Compliance Monitoring Report Form 37

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary lithographic printing operation.

Source Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
General Source Phone Number:	317-955-4082
SIC Code:	2752
County Location:	Marion
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 8-Color, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1.
- (b) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 7-Color, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4.
- (c) One (1) Heidelberg Sheetfed Heat Set Lithographic Printing Press, 8-Color, installed in 2007, identified as H-1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2.
- (d) One (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, 7-Color, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.
- (e) One (1) Heidelberg Sheetfed Offset Lithographic Printing Press, approved for construction in 2009, identified as H-2, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S5.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) One (1) natural gas fired boiler, identified as B-01, with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972. [326 IAC6-2]
- (b) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F).
 - (2) Having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68°F).
- (f) Closed loop heating and cooling systems.
- (g) Infrared curing equipment
- (h) Exposure chamber ("tower", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (i) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
 - (2) Using 80 tons or less of welding combustibles
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Heat exchanger cleaning and repair.
- (l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
 - (1) Three (3) bailers, identified as B-1A, B-2 and B-3, compact uncut scrap paper air conveyed from the die cutters and are equipped with two (2) cyclones for particulate control, identified as C-1 and C-3. Cyclone C-1 has a flow rate capacity of 47.05 acfm and Cyclone C-3 has a flow rate capacity of 10.80 acfm.
 - (2) One (1) paper shredder identified as PS-1 reduces defective scrap sheets with a maximum size of 51" by 48" to 5" to 12" sheets that are air conveyed to one (1) of the three (3) bailers dependent on paper type.
- (m) Paved and unpaved roads and parking lots with public access.
- (n) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (o) Other activities and categories with PM/PM10 emissions below insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: anti-offset powder

usage at each press with maximum usage for all presses combined resulting in calculated potential particulate emissions of 0.6 pounds per hour and 14 pounds per day.

- (p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:
- (1) One (1) pre-press area, installed in 1971, identified as PA-1, used for photographing, film developing, and plate preparation for the printing operation.
 - (2) Twelve (12) folders/glueers, identified as G-1 to G-12.
 - (3) One (1) Image Ink Jet Printer, identified as IM-1, attachment for the folder/glueers, using a maximum of 0.0007 gallons per hour of ink and 0.0013 gallons per hour of additive, exhausting inside the building.
 - (4) Five (5) Die Cutters, identified as B-1B, B-6, B-7, B-8 and B-9.
 - (5) One (1) Laser Die Cutter, identified as L-1, constructed in 2008, exempt from new construction requirements under 326 IAC 2-5.1-1, because this emission unit meets the criteria and is under the pollutant thresholds stated in 326 IAC 2-1.1-3(e)(1).
 - (6) Cold cleaner operations with a maximum solvent usage of 240 gallons per twelve (12) months consisting of one (1) water based parts washing tank, with a maximum capacity of 60 gallons.
- (q) Cold cleaner operations with a maximum solvent usage of 120 gallons per twelve (12) months consisting of one (1) solvent based parts washing tank, with a maximum capacity of 20 gallons. [326 IAC 8-3-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F097-26040-00107, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F097-26040-00107 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

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

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

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 8-Color, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1.
- (b) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 7-Color, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4.
- (c) One (1) Heidelberg Sheetfed Heat Set Lithographic Printing Press, 8-Color, installed in 2007, identified as H-1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2.
- (d) One (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, 7-Color, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.
- (e) One (1) Heidelberg Sheetfed Offset Lithographic Printing Press, approved for construction in 2009, identified as H-2, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S5.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The amount of VOC delivered to the printing presses, identified as M-1, M-2, K-1, H1, and H2, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are less than ninety-two (92) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) month consecutive period and render the 326 IAC 2-7 and 326 IAC 2-2 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC delivered to the printing presses, identified as M-1, M-2, K-1, H1, and H2, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with the above limit shall render 326 IAC 8-1-6 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for printing presses, identified as M-1, M-2, K-1, H1, and H2.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with Conditions D.1.1 and D.1.2 for VOC emissions shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor (based on EPA document "Draft Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing", EPA-HQ-OAR-2006-0536, July, 2006) for inks and finish coatings used on Presses M-1, M-2, K-1, H1, and H2.

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

D.1.5 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1, and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted (based on 95% retention factor for inks and finish coatings used on the presses) for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas fired boiler, identified as B-01, with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972.

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

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

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

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heating), The PM emissions from the 6.695 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activity:

- (q) Cold cleaner operations with a maximum solvent usage of 120 gallons per twelve (12) months consisting of one (1) solvent based parts washing tank, with a maximum capacity of 20 gallons. [326 IAC 8-3-2]

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

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

D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, 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.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
 - (1) Three (3) bailers, identified as B-1A, B-2 and B-3, compact uncut scrap paper air conveyed from the die cutters and are equipped with two (2) cyclones for particulate control, identified as C-1 and C-3. Cyclone C-1 has a flow rate capacity of 47.05 acfm and Cyclone C-3 has a flow rate capacity of 10.80 acfm.

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

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

D.4.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for three (3) bailers, identified as B-1A, B-2, and B-3 and their cyclones, identified as C-1 and C-3.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP Permit No.: F097-26040-00107
 Facility: Press M-1
 Parameter: VOC
 Limit: The VOC usage from the press, identified as M-1, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107
Facility: Press M-2
Parameter: VOC
Limit: The VOC usage from the press, identified as M-2, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107
Facility: Press H-1
Parameter: VOC
Limit: The VOC usage from the press, identified as H-1, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP Permit No.: F097-26040-00107
 Facility: Press H2
 Parameter: VOC
 Limit: The VOC usage from the press, identified as H-2, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107
Facility: Press K-1
Parameter: VOC
Limit: The VOC usage from the press, identified as K-1, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP Permit No.: F097-26040-00107
Facility: Facility Wide
Parameter: VOC
Limit: The VOC usage from the presses, identified as M-1, M-2, H-1, H-2 and K-1, shall be limited to less than ninety-eight (92.0) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 1	Column 1 + 2
	This Month (tons)	Previous Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP Permit No.: F097-26040-00107

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (ATSD) for a Federally
Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Shorewood Packaging Corporation of Indiana
Source Location:	620 South Belmont Avenue, Indianapolis, IN 46221
County:	Marion
SIC Code:	2752
Operation Permit No.:	F 097-26040-00107
Permit Reviewer:	Sarah Conner, Ph. D.

On March 14, 2009, the Office of Air Quality (OAQ) had a notice published in The Indianapolis Star, Indianapolis, Indiana, stating that Shorewood Packaging Corporation of Indiana had applied for the renewal of their Federally Enforceable State Operating Permit for an existing stationary lithographic printing operation. The notice also stated that the OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On April 13, 2009, David Triplett submitted comments to IDEM, OAQ on the draft Federally Enforceable State Operating Permit Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The one (1) solvent based parts washing tank should be classified as an insignificant activity; therefore, Shorewood Packaging Corporation of Indiana requests that the one (1) solvent based parts washing tank be moved from section A.2 of the permit into section A.3 of the permit under insignificant activities, and that section D.3 of the permit be updated to reflect these changes.

Response to Comment 1:

IDEM, OAQ has reviewed additional information from Shorewood Packaging Corporation of Indiana showing that a maximum of 120 gallons of solvent are used in the one (1) solvent based parts washer over twelve (12) months, which meets the definition of an insignificant activity pursuant to 326 IAC 2-7-1(21)(G)(vi)(DD) for cleaners and solvents. IDEM, OAQ agrees with the recommended changes, and will move the one (1) solvent based parts washer into section A.3 under insignificant activities and will update section D.3 of the permit. The permit has been revised as follows:

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

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

...

~~(f) Cold Cleaner operations with a maximum solvent usage of 240 gallons per 12 months. These degreasing operations consist of the following: [326 IAC 8-3-2]~~

~~(1) One (1) solvent based parts washing tank, with a maximum capacity of 20 gallons.~~

~~(2) One (1) water based parts washing tank, with a maximum capacity of 60 gallons.~~

...

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

This stationary source also includes the following insignificant activities:

...

(q) Cold cleaner operations with a maximum solvent usage of 120 gallons per twelve (12) months consisting of one (1) solvent based parts washing tank, with a maximum capacity of 20 gallons. [326 IAC 8-3-2]

...

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

~~Emissions Unit Description~~ **Insignificant Activity:**

~~(f) Cold Cleaner operations with a maximum solvent usage of 240 gallons per 12 months. These degreasing operations consist of the following: [326 IAC 8-3-2]~~

~~(1) One (1) solvent based parts washing tank, with a maximum capacity of 20 gallons.~~

(q) Cold cleaner operations with a maximum solvent usage of 120 gallons per twelve (12) months consisting of one (1) solvent based parts washing tank, with a maximum capacity of 20 gallons. [326 IAC 8-3-2]

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

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit. IDEM, OAQ will update the calculations to reflect that 120 gallons of solvent are used in the one (1) solvent based parts washer, not 240 gallons as previously calculated. In addition, IDEM, OAQ has decided to move the one (1) water based parts washer from section A.2 into section A.3 of the permit under insignificant activities pursuant to 326 IAC 2-7-1(21)(A)(iv).

The permit has been revised as described below, with deleted language as ~~strikeouts~~ and new language **bolded**:

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

This stationary source also includes the following insignificant activities:

...

- (p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:

...

- (6) Cold cleaner operations with a maximum solvent usage of 240 gallons per twelve (12) months consisting of one (1) water based parts washing tank, with a maximum capacity of 60 gallons.**

IDEM Contact

- (a) Questions regarding this proposed Federally Enforceable State Operating Permit Renewal can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Addendum to Technical Support Document - Appendix A: Emission Summary Potential to Emit

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 4/15/2009

Potential to Emit (PTE) by pollutant														
OPERATIONS														
Pollutant	PRINTING OPS							FINISHING OPS					NG Combustion OPS	TOTAL
	Pre-Press	Ink Jet Printing Operations	M1	M2	K1	H1	H2	Gluing	Die Cutters	Bailers	Laser Die Cutter	Parts Washers	NG Boiler	
	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr
VOC	0.580	0.007	19.612	32.815	41.973	49.536	49.536	0.220	0.000	0.000	0.304	0.432	0.161	195.177
HAP - Glycol Ether ¹	0.000	0.000	0.881	1.474	1.886	1.444	1.444	0.000	0.000	0.000	0.000	0.000	0.000	7.129
HAP - Xylene	0.000	0.000	0.002	0.004	0.005	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.019
HAP - Perchloroethylene	0.000	0.000	0.077	0.129	0.165	0.127	0.127	0.000	0.000	0.000	0.000	0.000	0.000	0.625
HAP - Trichloroethylene	0.000	0.000	0.023	0.039	0.050	0.038	0.038	0.000	0.000	0.000	0.000	0.000	0.000	0.187
HAP - Cumene	0.000	0.000	0.001	0.001	0.002	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.006
HAP - Hydroquinone	0.025	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.025
HAP - Ethylene Glycol	0.396	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.396
HAP-Vinyl Acetate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.220	0.000	0.000	0.000	0.000	0.000	0.220
HAP-Hexane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.053
HAP-Formaldehyde	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.002
Total HAPs from each emission unit	0.422	0.000	0.985	1.647	2.107	1.613	1.613	0.220	0.000	0.000	0.000	0.000	0.055	8.662
PM	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.056	6.226
PM ₁₀	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393
PM _{2.5}	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393
SO ₂	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.000	0.018	0.020
NO _x	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.016	0.000	2.932	2.948
CO	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.325	0.000	2.463	3.788

Highest Single HAP from all emission units

Total Combined HAPS from all emission units

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Appendix A: Emission Summary (Continued)
LIMITED Potential to Emit (PTE) by pollutant

Pollutant	OPERATIONS														TOTAL ton/yr
	PRINTING OPS							FINISHING OPS					NG Combustion OPS		
	Pre-Press ton/yr	Ink Jet Printing Operations ton/yr	M1 ton/yr	M2 ton/yr	K1 ton/yr	H1 ton/yr	H2 ton/yr	Gluing ton/yr	Die Cutters ton/yr	Bailers ton/yr	Laser Die Cutter ton/yr	Parts Washers ton/yr	NG Boiler ton/yr		
VOC	0.580	0.007	< 25 2	< 25 2	< 25 2	< 25 2	< 25	0.220	0.000	0.000	0.304	0.432	0.161	< 100.0	
HAP - Glycol Ether ¹	0.000	0.000	0.881	1.474	1.886	1.444	1.444	0.000	0.000	0.000	0.000	0.000	0.000	7.129	Highest Single HAP from all emission units
HAP - Xylene	0.000	0.000	0.002	0.004	0.005	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.019	
HAP - Perchloroethylene	0.000	0.000	0.077	0.129	0.165	0.127	0.127	0.000	0.000	0.000	0.000	0.000	0.000	0.625	
HAP - Trichloroethylene	0.000	0.000	0.023	0.039	0.050	0.038	0.038	0.000	0.000	0.000	0.000	0.000	0.000	0.187	
HAP - Cumene	0.000	0.000	0.001	0.001	0.002	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.006	
HAP - Hydroquinone	0.025	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.025	
HAP - Ethylene Glycol	0.396	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.396	
HAP-Vinyl Acetate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.220	0.000	0.000	0.000	0.000	0.000	0.220	
HAP-Hexane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.053	
HAP-Formaldehyde	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.002	
Total HAPs from each emission unit	0.422	0.000	0.985	1.647	2.107	1.613	1.613	0.220	0.000	0.000	0.000	0.000	0.055	8.662	Total Combined HAPs from all emission units
PM	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.056	6.226	
PM ₁₀	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
PM _{2.5}	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
SO ₂	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.000	0.018	0.020	
NO _x	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.016	0.000	2.932	2.948	
CO	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.325	0.000	2.463	3.788	

Limited Potential to Emit

Process/Emission unit	PM ton/yr	PM ₁₀ ton/yr	PM _{2.5} ton/yr	SO ₂ ton/yr	CO ton/yr	NO _x ton/yr	VOC ton/yr	Single HAP ton/yr	Total Combined HAPs ton/yr
Printing Presses: (M-1, M-2, K-1, H-1, H-2)	1.960	1.960	1.960	0.000	0.000	0.000	<92 2	7.129 (Glycol Ether)	7.965 (combined HAPs)
Insignificant Activities (Pre-Press, Ink Jet Printing, Finishing: Cutting, Gluing, Bailing, and Parts Washers)	4.210	4.210	4.210	0.002	1.325	0.016	1.544	0.40 (ethylene glycol)	0.641
Natural Gas Combustion	0.056	0.223	0.223	0.018	2.463	2.932	0.161	0.05 (hexane)	0.055
Total PTE after issuance	6.226	6.393	6.393	0.020	3.788	2.948	<100.0	7.129 (Glycol Ether)	8.662

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: The amount of VOC delivered to the printing presses, identified as M-1, M-2, K-1, H1, and H2, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) t

**Addendum to Technical Support Document - Appendix A: Emissions Calculations
Potential to Emit from Parts Washers**

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 4/15/2009

VOC and HAP Emissions from two (2) parts washers

Unit	Size (gal)	Max. Annual Solvent Usage (gal/yr)	VOC Content (lb/gal)	VOC PTE (ton/yr)
Solvent-based	20	120	7	0.42
Water-based	60	240	0.1	0.012
Total				0.432

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name: Shorewood Packaging Corporation of Indiana
Source Location: 620 South Belmont Avenue, Indianapolis, IN 46221
County: Marion
SIC Code: 2752
Operation Permit No.: F097-26040-00107
Permit Reviewer: Sarah Conner, Ph. D.

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Shorewood Packaging Corporation of Indiana relating to the operation of an existing stationary lithographic printing operation.

History

- On February 4, 2008, Shorewood Packaging Corporation of Indiana submitted an application to the OAQ requesting to renew its operating permit. Shorewood Packaging Corporation of Indiana was issued a FESOP Renewal F097-13958-00107 on November 7, 2003.
- On March 14, 2008 an Administrative Amendment application F097-26263-00107 for the extension of the permit term from 5 years to 10 years was received and combined with F097-26040-00107.
- On December 23, 2008 an Administrative Amendment application F097-27296-00107 for the replacement of a printing press, identified as M-1, with a new printing press, identified as H-2.
- On March 2nd, 2009, the source submitted updated calculations for the five (5) die cutters, and requested that die cutter, identified as B-3, be replaced with a new die cutter, identified as B-1B in their FESOP renewal.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 8-Color, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1.
- (b) One (1) Mitsubishi Sheet Fed Non-Heat Set Offset Lithographic Press, 7-Color, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4.
- (c) One (1) Heidelberg Sheetfed Heat Set Lithographic Printing Press, 8-Color, installed in 2007, identified as H-1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2.
- (d) One (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, 7-Color, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.

The following is a list of the new emission units:

- (e) One (1) Heidelberg Sheetfed Offset Lithographic Printing Press, approved for construction in 2009, identified as H-2, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S5.
- (f) Cold Cleaner operations with a maximum solvent usage of 240 gallons per 12 months. These degreasing operations consist of the following: [326 IAC 8-3-2]
 - (1) One (1) solvent based parts washing tank, with a maximum capacity of 20 gallons.
 - (2) One (1) water based parts washing tank, with a maximum capacity of 60 gallons.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas fired boiler, identified as B-01, with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972. [326 IAC 6-2]
- (b) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents characterized as follows: [326 IAC 8-3]
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F).
 - (2) Having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68°F).

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (f) Closed loop heating and cooling systems.
- (g) Infrared curing equipment
- (h) Exposure chamber ("tower", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (i) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
 - (2) Using 80 tons or less of welding combustibles
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Heat exchanger cleaning and repair.

- (l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
 - (1) Three (3) bailers, identified as B-1A, B-2 and B-3, compact uncut scrap paper air conveyed from the die cutters and are equipped with two (2) cyclones for particulate control, identified as C-1 and C-3. Cyclone C-1 has a flow rate capacity of 47.05 acfm and Cyclone C-3 has a flow rate capacity of 10.80 acfm.
 - (2) One (1) paper shredder identified as PS-1 reduces defective scrap sheets with a maximum size of 51" by 48" to 5" to 12" sheets that are air conveyed to one (1) of the three (3) bailers dependent on paper type.
- (m) Paved and unpaved roads and parking lots with public access.
- (n) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (o) Other activities and categories with PM/PM10 emissions below insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: anti-offset powder usage at each press with maximum usage for all presses combined resulting in calculated potential particulate emissions of 0.6 pounds per hour and 14 pounds per day.
- (p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:
 - (1) One (1) pre-press area, installed in 1971, identified as PA-1, used for photographing, film developing, and plate preparation for the printing operation.
 - (2) Twelve (12) folders/glueers, identified as G-1 to G-12.
 - (3) One (1) Image Ink Jet Printer, identified as IM-1, attachment for the folder/glueers, using a maximum of 0.0007 gallons per hour of ink and 0.0013 gallons per hour of additive, exhausting inside the building.
 - (4) Four (4) Die Cutters, identified as B-6, B-7, B-8 and B-9.

The following is a list of the new insignificant activities:

- (a) One (1) Die Cutter, approved for construction in 2009, identified as B-1B.

Insignificant Activities Constructed and/or Operated without a Permit

- (a) One (1) Laser Die Cutter, identified as L-1, constructed in 2008.

Insignificant Activities Removed From the Source

- (a) One (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and
- (b) One (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.

Existing Approvals

Since the issuance of the FESOP Renewal (F097-13958-00107) on November 7, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Permit Revision F097-18937-00107 was issued on June 15, 2004;
- (b) Significant Permit Revision F097-23126-00107 was issued on October 19, 2006; and
- (c) Administrative Amendment F097-24918-00107 was issued on July 10, 2007.

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 determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

- (1) Sections A.3, D.2.1 and D.2.2 of the permit have been updated to remove the 2.76 and 1.2 MMBtu per hour boilers from the permit.
- (2) Section D.3.1 has been added due to the addition of cold cleaning operations using one (1) solvent based parts washing tank.

Enforcement Issue

IDEM is aware that the emission unit Laser Die Cutter, identified as L-1, and cold cleaner operations consisting of one (1) solvent based parts washing tank have been constructed and/or operated. The unit L-1 has the potential to emit all regulated pollutants at exempt levels specified in 326 IAC 2-1.1-3(e), which does not require IDEM approval. The cold cleaner operations consisting of one (1) solvent based parts washing tank also has the potential to emit the pollutant VOC at exempt levels specified in 326 IAC 2-1.1-3(e), which does not require IDEM approval. Therefore, there are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 17).

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 November 8, 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.
¹ 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 X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally 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, and 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 Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph 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. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana 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

Appendix A of this TSD reflects the unrestricted potential emissions of the source

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutant VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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 Part 70 applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Potential To Emit (tons/year)								
Process/ Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC ¹	CO	NO _x	HAPs
Press M-1	0.24	0.24	0.24	0.00	<25.0 for Any Single Press	0.00	0.00	Worst Case Single HAP 7.13 (Glycol Ether)
Press M-2	0.41	0.41	0.41	0.00		0.00	0.00	
Press K-1	0.52	0.52	0.52	0.00		0.00	0.00	
Press H-1	0.40	0.40	0.40	0.00		0.00	0.00	
Press H-2	0.40	0.40	0.40	0.00	<92.0 Combined for all Presses	0.00	0.00	Combined HAPS 7.97
Pre-Press	0.00	0.00	0.00	0.00	0.58	0.00	0.00	Single HAP 0.40 Combined HAPS 0.70
Ink Jet Printing	0.00	0.00	0.00	0.00	0.01	0.00	0.00	
Gluing	0.00	0.00	0.00	0.00	0.22	0.00	0.00	
Die Cutters	0.78	0.78	0.78	0.00	0.00	0.00	0.00	
Laser Die Citter	0.18	0.18	0.18	0.00	0.30	0.02	1.32	
Bailers	3.26	3.26	3.26	0.00	0.00	0.00	0.00	
Parts Washers	0.00	0.00	0.00	0.00	0.85	0.00	0.00	
NG Boiler	0.06	0.22	0.22	0.02	0.15	2.93	2.46	
Total PTE of Entire Source (tons/yr)	6.23	6.39	6.39	0.02	<100	3.79	2.95	Worst Case Single HAP 7.13 (Glycol Ether) Total Combined HAPS 8.7
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10 for Single HAP 25 for Comined HAPS
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA

Note 1: VOC emissions are limited for the printing presses, M-1, M-2, K-1, H-1 and H-2.

- (a) This existing stationary source is not major for PSD because the emissions of each attainment regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (b) 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.

Federal Rule Applicability

The following federal rules are not applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included for this FESOP permit because the source does not use rotogravure printing.
- (c) The requirements of the New Source Performance Standards for Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 (40 CFR 60.40, Subpart D, are not included in the permit for the boiler, identified as B-01, because the boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (d) The requirements of the New Source Performance Standards for Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (40 CFR 60.40Da, Subpart Da, are not included in the permit for the boiler, identified as B-01, because the boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (e) The requirements of the New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40b, Subpart Db, are not included in the permit for the boiler, identified as B-01, because the boiler is rated at less than one hundred (100) MMBtu per hour.
- (f) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c, Subpart Dc, are not included in the permit for the boiler, identified as B-01, because the boiler is rated at less than ten (10) MMBtu per hour.
- (g) The requirements of the NSPS of Performance for Flexible Vinyl and Urethane Coating and Printing Source, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit, because this source does not print or coat flexible vinyl or urethane products.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (i) The requirements of the NESHAP for National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry , 40 CFR 63.440, Subpart S (326 IAC 20-33), are not included in the permit, because this source is not a major source of hazardous air pollutants (HAPs).
- (j) The requirements of National Emission Standards for Halogenated Solvent Cleaning, Subpart T are not included in the permit since Shorewood Packaging Corporation of Indiana is not a major source of hazardous air pollutants (HAPs).
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, Subpart KK are not included in the permit since Shorewood Packaging Corporation of Indiana does not operate a rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and is not a major source of HAPs.

- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating, Subpart JJJJ, are not included in the permit since Shorewood Packaging Corporation of Indiana does not operate a web coating line and is not a major source of HAPs.
- (m) The requirements of the NESHAP for National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63.4280, Subpart OOOO (326 IAC 20-), are not included in the permit, because this source is not a major source of hazardous air pollutants (HAPs).

Compliance Assurance Monitoring (CAM)

- (n) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)

- (a) Pursuant to 326 IAC 2-8-4, the printing presses (M1, M2, K1, H1 and H2), shall be limited to less than 92.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit will keep the source wide potential to emit VOC to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (b) In addition, each printing press (M1, M2, K1, H1 and H2), shall each be limited to less than 25.0 tons per year of VOC emissions. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable to each printing press.

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

The potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do 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 and it is not required to obtain a Part 70 operating permit. 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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

Printing Operations

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This rule applies to new facilities constructed after January 1, 1980 with the potential to emit of VOC of 25 tons per year or more. Printing presses, M-2, K-1, H-1 and H-2, have potential VOC emissions greater than 25 tons.

The following limit shall apply to the printing presses, identified as M-1, M-2, K-1, H-1 and H-2, in order to render 326 IAC 8-1-6 not applicable:

- (a) The VOC usage from the presses, identified as M-1, M-2, K-1, H-1, and H-2 shall each be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable to each printing press.

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

Although this source involves the coating of paper, Shorewood Packaging Corporation of Indiana does not conduct web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels. Therefore, 326 IAC 8-2-5 does not apply.

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

The potential VOC emissions from this source are greater than 100 tons per year and this source commenced operation after November 1, 1980. However, Shorewood Packaging Corporation of Indiana does not operate a packaging rotogravure, a publication rotogravure, and/or a flexographic printing press; therefore, the requirements of 326 IAC 8-5-5 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The potential VOC emissions from this source are greater than 100 tons per year. However, this source commenced operation after January 1, 1980; therefore, the requirements of 326 IAC 8-6 are not applicable.

There are no other 326 IAC 8 Rules that are applicable to the printing presses.

Boiler

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

Pursuant to 326 IAC 6-2-2, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb per MMBtu; therefore Pt from the 6.695 million Btu per hour boiler, identified as B-01, shall not exceed 0.6 lb per MMBtu.

Based on Appendix A, the potential to emit of PM from the boiler identified as B-01, constructed in 1972, is 0.06 tons per year.

$$\begin{aligned} \text{For B-01} \quad & 0.056 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.013 \text{ lbs/hr} \\ & (0.013 \text{ lbs/hr} / 6.695 \text{ MMBtu/hr}) = 0.002 \text{ lbs PM per MMBtu} \end{aligned}$$

Therefore, the boiler, identified as B-01, will comply with this rule.

Paperboard Production

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The potential particulate emissions are each less than 0.551 pound per hour for the following emission units: printing presses, identified as M-1, M-2, K-1, H-1 and H-2, the die cutters, laser die cutter, bailers, and paper shredder. Therefore, pursuant to 326 IAC 6-3-1(b)(14), none of these emission units are subject to this rule.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source is located in Marion County and is not specifically listed in 326 IAC 6.5-6. In addition, the potential to emit particulate matter is less than one hundred (100) tons per year and the actual particulate matter emissions are less than ten (10) tons per year. Therefore, the requirements of 326 IAC 6.5 do not apply.

Cold Cleaners

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, constructed after January 1, 1980, has cold cleaning operations. Therefore, pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with an emissions unit 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.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

- (a) There are no compliance determination and no compliance monitoring requirements applicable to this source.
- (b) There are no testing requirements applicable to this source.

Recommendation

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

An incomplete application for the purposes of this review was received on February 4, 2008. A Notice of Deficiency (NOD) was sent on March 7, 2008. Subsequent additional information was received on March 6, March 7, March 10, March 11, April 22, May 1, May 13, May 21, May 28, and June 5, 2008. A complete application for the purposes of this review was received on June 6, 2008. Furthermore, an administrative amendment application for a ten year permit extension was received on March 17, 2008 and assigned number F097-26263-00107, which has been incorporated into this permit renewal, F097-26040-00107. An application for an administrative amendment was received on December 23, 2008, and assigned number F097-27296-000107, was also incorporated into this permit renewal F097-26040-00107.

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 existing stationary lithographic printing operation shall be subject to the conditions of the attached proposed FESOP Renewal No. F097-26040-00107.

Appendix A: Emission Summary Potential to Emit

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Potential to Emit (PTE) by pollutant

Pollutant	OPERATIONS														TOTAL
	PRINTING OPS							FINISHING OPS					NG Combustion OPS		
	Pre-Press	Ink Jet Printing Operations	M1	M2	K1	H1	H2	Gluing	Die Cutters	Bailers	Laser Die Cutter	Parts Washers	NG Boiler		
	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	
VOC	0.580	0.007	19.612	32.815	41.973	49.536	49.536	0.220	0.000	0.000	0.304	0.852	0.161	195.597	
HAP - Glycol Ether ¹	0.000	0.000	0.881	1.474	1.886	1.444	1.444	0.000	0.000	0.000	0.000	0.000	0.000	7.129	
HAP - Xylene	0.000	0.000	0.002	0.004	0.005	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.019	
HAP - Perchloroethylene	0.000	0.000	0.077	0.129	0.165	0.127	0.127	0.000	0.000	0.000	0.000	0.000	0.000	0.625	
HAP - Trichloroethylene	0.000	0.000	0.023	0.039	0.050	0.038	0.038	0.000	0.000	0.000	0.000	0.000	0.000	0.187	
HAP - Cumene	0.000	0.000	0.001	0.001	0.002	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.006	
HAP - Hydroquinone	0.025	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.025	
HAP - Ethylene Glycol	0.396	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.396	
HAP-Vinyl Acetate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.220	0.000	0.000	0.000	0.000	0.000	0.220	
HAP-Hexane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.053	
HAP-Formaldehyde	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.002	
Total HAPs from each emission unit	0.422	0.000	0.985	1.647	2.107	1.613	1.613	0.220	0.000	0.000	0.000	0.000	0.055	8.662	
PM	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.056	6.226	
PM ₁₀	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
PM _{2.5}	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
SO ₂	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.000	0.018	0.020	
NO _x	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.016	0.000	2.932	2.948	
CO	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.325	0.000	2.463	3.788	

Highest Single HAP from all emission units

Total Combined HAPS from all emission units

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Appendix A: Emission Summary (Continued)
LIMITED Potential to Emit (PTE) by pollutant

Pollutant	OPERATIONS														TOTAL ton/yr
	PRINTING OPS							FINISHING OPS					NG Combustion OPS		
	Pre-Press ton/yr	Ink Jet Printing Operations ton/yr	M1 ton/yr	M2 ton/yr	K1 ton/yr	H1 ton/yr	H2 ton/yr	Gluing ton/yr	Die Cutters ton/yr	Bailers ton/yr	Laser Die Cutter ton/yr	Parts Washers ton/yr	NG Boiler ton/yr		
VOC	0.580	0.007	< 25 ²	< 25 ²	< 25 ²	< 25 ²	< 25	0.220	0.000	0.000	0.304	0.852	0.161	< 100.0	
HAP - Glycol Ether ¹	0.000	0.000	0.881	1.474	1.886	1.444	1.444	0.000	0.000	0.000	0.000	0.000	0.000	7.129	Highest Single HAP from all emission units
HAP - Xylene	0.000	0.000	0.002	0.004	0.005	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.019	
HAP - Perchloroethylene	0.000	0.000	0.077	0.129	0.165	0.127	0.127	0.000	0.000	0.000	0.000	0.000	0.000	0.625	
HAP - Trichloroethylene	0.000	0.000	0.023	0.039	0.050	0.038	0.038	0.000	0.000	0.000	0.000	0.000	0.000	0.187	
HAP - Cumene	0.000	0.000	0.001	0.001	0.002	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.006	
HAP - Hydroquinone	0.025	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.025	
HAP - Ethylene Glycol	0.396	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.396	
HAP-Vinyl Acetate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.220	0.000	0.000	0.000	0.000	0.000	0.220	
HAP-Hexane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.053	
HAP-Formaldehyde	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.002	
Total HAPs from each emission unit	0.422	0.000	0.985	1.647	2.107	1.613	1.613	0.220	0.000	0.000	0.000	0.000	0.055	8.662	Total Combined HAPs from all emission units
PM	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.056	6.226	
PM ₁₀	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
PM _{2.5}	0.000	0.000	0.242	0.405	0.519	0.397	0.397	0.000	0.777	3.258	0.176	0.000	0.223	6.393	
SO ₂	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002	0.000	0.018	0.020	
NO _x	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.016	0.000	2.932	2.948	
CO	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.325	0.000	2.463	3.788	

Limited Potential to Emit

Process/Emission unit	PM ton/yr	PM ₁₀ ton/yr	PM _{2.5} ton/yr	SO ₂ ton/yr	CO ton/yr	NO _x ton/yr	VOC ton/yr	Single HAP ton/yr	Total Combined HAPs ton/yr
Printing Presses: (M-1, M-2, K-1, H-1, H-2)	1.960	1.960	1.960	0.000	0.000	0.000	<92 ²	7.129 (Glycol Ether)	7.965 (combined HAPs)
Insignificant Activities (Pre-Press, Ink Jet Printing, Finishing: Cutting, Gluing, Bailing, and Parts Washers)	4.210	4.210	4.210	0.002	1.325	0.016	1.964	0.40 (ethylene glycol)	0.641
Natural Gas Combustion	0.056	0.223	0.223	0.018	2.463	2.932	0.161	0.05 (hexane)	0.055
Total PTE after issuance	6.226	6.393	6.393	0.020	3.788	2.948	<100.0	7.129 (Glycol Ether)	8.662

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: The amount of VOC delivered to the printing presses, identified as M-1, M-2, K-1, H1, and H2, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. In addition, the amount of VOC delivered to the printing presses, identified as M-1, M-2, K-1, H1, and H2, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are less than ninety-two (92) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Appendix A: Potential to Emit - M-1 Non-Heatset Litho Printing Press

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Press I.D.	Max Sheets per hour	Max Image Size Inches	Max hourly MMin ² /hr	Hours/Year	MMin ² /YEAR
M-1	12000	40 x 27.94	13.4112	8760	117482.112

Pollutant: Volatile Organic Compounds

Material Name	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Inks	2.63	28%	5.00%	117482	2000	2.1628
Finish Coating	3.92	6%	5.00%	117482	2000	0.7081
Fountain Solution	0.25	99%	100.00%	117482	2000	14.5384
Blanket Wash	0.075	100%	50.00%	117482	2000	2.2028
Total Emissions						19.6121

Pollutant: PM-10²

Material Name	Maxium Coverage lbs/MMin ²	Transfer Efficiency	Capture Efficiency	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Spray Powder	0.0165	75.00%	0.00%	117482	2000	0.2423
Total Emissions						0.2423

Pollutant: Glycol Ether¹

Material Name	Maxium Coverage lbs/MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Blanket Wash	0.075	40.00%	50.00%	117482	2000	0.8811
Total Emissions						0.8811

Appendix A: EU-M1 Non-Heatset Litho, Shorewood Packaging Corporation of Indiana, F097-26040-00107 (Continued)

Pollutant: Perchloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	1.00%	5.00%	117482	2000	0.0772
Total Emissions						0.0772

Pollutant: Cumene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.01%	5.00%	117482	2000	0.0008
Total Emissions						0.0008

Pollutant: Trichloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.30%	5.00%	117482	2000	0.0232
Total Emissions						0.0232

Pollutant: Xylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.03%	5.00%	117482	2000	0.0023
Total Emissions						0.0023

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Second Edition, 2000.

Note³: Calculations were adjusted based on EPA guidance (EPA-473/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing). These calculations (Non-heat set Offset printing) reflect the usage of a substrate retention factor of 0.95 for oil-based inks, coatings (varnishes) and cleaner (5% flashoff VOC/HAP emissions generated), and a retention factor of 20% for the water-based and UV coatings due to the use of heat for these coatings. A 100% flashoff was utilized for the fountain solution. A 50% flashoff was used for the blanket wash.

Note⁴: Heatset is only utilized for the UV and water-based coatings. Oil-based inks are processed without the use of heat.

Methodology

Throughput (MMin² per Year) = Maximum line speed (feet per minute) * Convert feet to inches * Maximum print width (inches) * 60 minutes per hour * 8760 hours per year

VOC/HAP Emissions

VOC (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput in MMin² per hr * 1 Ton per 2000 lb.

HAP (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage HAP (water minus organics) * Flash off * Throughput in MMin² per hour * 1 Ton per 2000 lb.

Appendix A: Potential to Emit - M-2 Non-Heatset Litho Printing Press

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Press I.D.	Max Sheets per hour	Max Image Size Inches	Max hourly MMin ² /hr	Hours/Year	MMin ² /YEAR
M-2	12000	51.19 x 36.53	22.4396484	8760	196571.32

Pollutant: Volatile Organic Compounds

Material Name	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Inks	2.63	28%	5.00%	196571	2000	3.62
Finish Coating	3.92	6%	5.00%	196571	2000	1.18
Fountain Solution	0.25	99%	100.00%	196571	2000	24.33
Blanket Wash	0.075	100%	50.00%	196571	2000	3.69
Total Emissions						32.82

Pollutant: PM-10²

Material Name	Maxium Coverage lbs/MMin ²	Transfer Efficiency	Capture Efficiency	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Spray Powder	0.0165	75.00%	0.00%	196571	2000	0.41
Total Emissions						0.41

Pollutant: Glycol Ether¹

Material Name	Maxium Coverage lbs/MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Blanket Wash	0.075	40.00%	50.00%	196571	2000	1.47
Total Emissions						1.47

Appendix A: EU-M2 Non-Heatset Litho , Shorewood Packaging Corporation of Indiana, F097-26040-00107 (Continued)

Pollutant: Perchloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	1.00%	5.00%	196571	2000	0.13
Total Emissions						0.13

Pollutant: Cumene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.01%	5.00%	196571	2000	0.00
Total Emissions						0.00

Pollutant: Trichloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.30%	5.00%	196571	2000	0.04
Total Emissions						0.04

Pollutant: Xylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.03%	5.00%	196571	2000	0.00
Total Emissions						0.00

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Second Edition, 2000.

Note³: Calculations were adjusted based on EPA guidance (EPA-473/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing). These calculations (Non-heat set Offset printing) reflect the usage of a substrate retention factor of 0.95 for oil-based inks, coatings (varnishes) and cleaner (5% flashoff VOC/HAP emissions generated), and a retention factor of 20% for the water-based and UV coatings due to the use of heat for these coatings. A 100% flashoff was utilized for the fountain solution. A 50% flashoff was used for the blanket wash.

Note⁴: Heatset is only utilized for the UV and water-based coatings. Oil-based inks are processed without the use of heat.

Methodology

Throughput (MMin² per Year) = Maxium line speed (feet per minute) * Convert feet to inches * Maximum print width (inches) * 60 minutes per hour * 8760 hours per year

VOC/HAP Emissions

VOC (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput in MMin² per hr * 1 Ton per 2000 lb.

HAP (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage HAP (water minus organics) * Flash off * Throughput in MMin² per hour * 1 Ton per 2000 lb.

Appendix A: Potential to Emit - K-1 Litho Printing Press

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Press I.D.	Max Sheets per hour	Max Image Size Inches	Max hourly MMin ² /hr	Hours/Year	MMin ² /YEAR
K-1	15000	51.19 x 37.38	28.702233	8760	251431.5611

Pollutant: Volatile Organic Compounds

Material Name	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Inks	2.63	28%	5.00%	251432	2000	4.63
Finish Coating	3.92	6%	5.00%	251432	2000	1.52
Fountain Solution	0.25	99%	100.00%	251432	2000	31.11
Blanket Wash	0.075	100%	50.00%	251432	2000	4.71
Total Emissions						41.97

Pollutant: PM-10²

Material Name	Maxium Coverage lbs/MMin ²	Transfer Efficiency	Capture Efficiency	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Spray Powder	0.0165	75.00%	0.00%	251432	2000	0.52
Total Emissions						0.52

Pollutant: Glycol Ether¹

Material Name	Maxium Coverage lbs/MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Blanket Wash	0.075	40.00%	50.00%	251432	2000	1.89
Total Emissions						1.89

Appendix A: EU-K1 Litho Printing , Shorewood Packaging Corporation of Indiana, F097-26040-00107 (Continued)

Pollutant: Perchloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	1.00%	5.00%	251432	2000	0.17
					Total Emissions	0.17

Pollutant: Cumene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.01%	5.00%	251432	2000	0.00
					Total Emissions	0.00

Pollutant: Trichloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.30%	5.00%	251432	2000	0.05
					Total Emissions	0.05

Pollutant: Xylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.03%	5.00%	251432	2000	0.00
					Total Emissions	0.00

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Second Edition, 2000.

Note³: Calculations were adjusted based on EPA guidance (EPA-473/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing). These calculations (Non-heat set Offset printing) reflect the usage of a substrate retention factor of 0.95 for oil-based inks, coatings (varnishes) and cleaner (5% flashoff VOC/HAP emissions generated), and a retention factor of 20% for the water-based and UV coatings due to the use of heat for these coatings. A 100% flashoff was utilized for the fountain solution. A 50% flashoff was used for the blanket wash.

Note⁴: Heatset is only utilized for the UV and water-based coatings. Oil-based inks are processed without the use of heat.

Methodology

Throughput (MMin² per Year) = Maxium line speed (feet per minute) * Convert feet to inches * Maximum print width (inches) * 60 minutes per hour * 8760 hours per year

VOC/HAP Emissions

VOC (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput in MMin² per hr * 1 Ton per 2000 lb.

HAP (ton/yr)= Maximum Coverage pounds per MMin² * Weight percentage HAP (water minus organics) * Flash off * Throughput in MMin² per hour * 1 Ton per 2000 lb.

Appendix A: Potential to Emit - H-1 Heatset Litho Printing Press

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Press I.D.	Max Sheets per hour	Max Image Size Inches	Max hourly MMin ² /hr	Hours/Year	MMin ² /YEAR
H-1	18000	29.53 x 41.34	21.9738636	8760	192491.0451

Pollutant: Volatile Organic Compounds

Material Name	Maxium Coverage lbs/MMin ²	Weight % Volatiles	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Inks	2.63	28%	5.00%	192491	2000	3.54
Finish Coating	3.92	6%	80.00%	192491	2000	18.56
Fountain Solution	0.25	99%	100.00%	192491	2000	23.82
Blanket Wash	0.075	100%	50.00%	192491	2000	3.61
Total Emissions						49.54

Pollutant: PM-10²

Material Name	Maxium Coverage lbs/MMin ²	Transfer Efficiency	Capture Efficiency	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Spray Powder	0.0165	75.00%	0.00%	192491	2000	0.40
Total Emissions						0.40

Pollutant: Glycol Ether¹

Material Name	Maxium Coverage lbs/MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Blanket Wash	0.075	40.00%	50.00%	192491	2000	1.44
Total Emissions						1.44

Appendix A: EU-H1 Heatset Litho, Shorewood Packaging Corporation of Indiana, F097-26040-00107 (Continued)**Pollutant: Perchloroethylene**

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	1.00%	5.00%	192491	2000	0.13
Total Emissions						0.13

Pollutant: Cumene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.01%	5.00%	192491	2000	0.00
Total Emissions						0.00

Pollutant: Trichloroethylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.30%	5.00%	192491	2000	0.04
Total Emissions						0.04

Pollutant: Xylene

Material Name	Maxium Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ³	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.03%	5.00%	192491	2000	0.00
Total Emissions						0.00

Note¹: Glycol ethers used by Shorewood Packaging, Inc. can not be confirmed to be all delisted and the Source has requested to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Second Edition, 2000.

Note³: Calculations were adjusted based on EPA guidance (EPA-473/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing). These calculations (Non-heat set Offset printing) reflect the usage of a substrate retention factor of 0.95 for oil-based inks, coatings (varnishes) and cleaner (5% flashoff VOC/HAP emissions generated), and a retention factor of 20% for the water-based and UV coatings due to the use of heat for these coatings. A 100% flashoff was utilized for the fountain solution. A 50% flashoff was used for the blanket wash.

Note⁴: Heatset is only utilized for the UV and water-based coatings. Oil-based inks are processed without the use of heat.

Methodology

Throughput (MMin² per Year) = Maxium line speed (feet per minute) * Convert feet to inches * Maximum print width (inches) * 60 minutes per hour * 8760 hours per year

VOC/HAP Emissions

VOC (ton/yr) = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput in MMin² per hr * 1 Ton per 2000 lb.

HAP (ton/yr) = Maximum Coverage pounds per MMin² * Weight percentage HAP (water minus organics) * Flash off * Throughput in MMin² per hour * 1 Ton per 2000 lb.

Potential to Emit from Printing Press Operations: H2

Company Name: Shorewood Packaging Corporation of Indiana
 Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
 Permit Renewal No.: F097-26040-00107
 Reviewer: Sarah Conner, Ph. D.
 Date: 2/2/2009

Same press as H1 - thus emission calculations are copied from that unit

Process Information

Press I.D.	Max Sheets per hour	Max Image Size Inches	Max hourly MMin ² /hr	HR/Year	MMin ² /Year
H2	18000	29.53 x 41.34	21.9738636	8760	192491.045

Pollutant: Volatile Organic Compounds

Material Name	Maximum Coverage lbs/MMin ²	Weight % Volatiles*	Flash Off % ^{3,5}	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Inks	2.63	28%	5.00%	192491	2000	3.54
Coating	3.92	6%	80.00%	192491	2000	18.56
Fountain Solution	0.25	99%	100.00%	192491	2000	23.82
Blanket Wash ⁴	0.075	100%	50.00%	192491	2000	3.61
					Total Emissions	49.54

Pollutant: PM-10²

Material Name	Maximum Coverage lbs/MMin ²	Transfer Efficiency	Capture Efficiency	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Spray Powder (insignificant activity)	0.0165	75.00%	0.00%	192491	2000	0.40
					Total Emissions	0.40

Pollutant: Glycol Ether¹

Material Name	Maximum Coverage lbs/MMin ²	Weight % HAP	Flash Off %	Through Put MMin ² /Year	Tons 2000 lbs	Tons Year
Blanket Wash ⁴	0.075	40.00%	50.00%	192491	2000	1.44
					Total Emissions	1.44

Appendix A: EU-H2 Heatset Litho, Shorewood Packaging Corporation of Indiana, F097-26040-00107 (Continued)

Pollutant: Perchloroethylene

Material Name	Maximum Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ^{3,5}	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	1.00%	5.00%	192491	2000	0.13
Total Emissions						0.13

Pollutant: Cumene

Material Name	Maximum Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ^{3,5}	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.01%	5.00%	192491	2000	0.00
Total Emissions						0.00

Pollutant: Trichloroethylene

Material Name	Maximum Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ^{3,5}	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.30%	5.00%	192491	2000	0.04
Total Emissions						0.04

Pollutant: Xylene

Material Name	Maximum Coverage lbs/ MMin ²	Weight % HAP	Flash Off % ^{3,5}	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Inks	2.63	0.03%	5.00%	192491	2000	0.00
Total Emissions						0.00

Note¹: Shorewood Packaging, Inc. wishes to account for all glycol ether emissions as HAP in order to simplify recordkeeping.

Note²: Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Sec

Note³: Calculations were adjusted based on EPA guidance (EPA-473/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing). These calculations reflect the usage of a substrate retention factor of

Note⁴: Blanket Wash flash-off of 50% accounts for the reduction due to closed storage of wipe-down rags, which are then sent off-site for proper disposal.

Note⁵: Heatset is only utilized for the UV and water-based coatings. Oil-based inks are processed without the use of heat.

Methodology

VOC (ton/yr) = Maximum Coverage (pounds per MMin²) x Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) x Flash off (%) * Throughput (MMin²perYear) x 1 Ton per 2000 pounds

Throughput (MMin²perYear) = Maxium line speed (feet per minute) * x Convert feet to inches x Maximum print width inches (in x in) x 60 minutes per hour * 8760 hours per year

Appendix A: Potential to Emit - B-1B, B-6, B-7, B-8 and B-9 Five (5) Die Cutters

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Die Cutter ID	Max Sheets/hr	Max Sheet Size (inches)	Square Feet (Sf) /hr	Max Basis wt for Sheets (lb/1000 SF)	Max Sheet throughput (ton/hr)	Emission Factor ¹ (lb PM/ton)	Control Efficiency (Cyclones)	PTE -PM (lb/hr)	PTE - PM (ton/yr)
B-1B	9000	28" x 41"	71750	66.3	2.38	0.35	95.00%	0.04	0.18
B-6	7000	28" x 40"	54444	66.3	1.80	0.35	95.00%	0.03	0.14
B-7	7000	28" x 40"	54444	66.3	1.80	0.35	95.00%	0.03	0.14
B-8	5000	36" x 50"	62500	66.3	2.07	0.35	95.00%	0.04	0.16
B-9	5000	36" x 50"	62500	66.3	2.07	0.35	95.00%	0.04	0.16
Total								0.18	0.78

Note¹: PM Emission Factors: There are no emission factors for paper under AP-42, Chapter 10. A similar emission factor for manual cutting was utilized from FIRE

Appendix A: Potential to Emit - L-1 Laser Die Cutter

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Process Information

Board Dimensions inches	Board Wt. lb/cu. In.	Kerf Width inches	Velocity in/min	cubic inches burned per minute	pounds burned per minute	tons burned per hour
48 x 0.625 x 60	0.026	0.056	48	1.68	0.04368	0.0013104

Emission Calculations

Pollutant	Factor lbs/ton ¹	PTE (ton/yr)
PM ₁₀	30.6	0.1756
CO	230.8	1.3247
NO _x	2.8	0.0161
SO ₂	0.4	0.0023
VOC	53	0.3042

Note¹: Emission factors from AP-42, Chapter 1, Table 1.10-1.

Appendix A: Potential to Emit - Twelve (12) Gluers (G-1 to G-12) Finishing Operations

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

VOC and HAP Emissions

Glue

Maximum Glue usage per hour:	1.125	gal/hr
Glue Density:	8.920	lb/gal

Material	Weight %	Potential Emissions (ton/yr)
Glue		
Vinyl acetate (VOC/HAP)	0.5%	0.220
	Total:	0.220

Methodology

VOC/HAP emissions (ton/yr) = Density (lb/gal) x Maximum Glue usage (gal/hr) x Weight % x 8,760 hrs/yr x 1 ton/2,000 lbs

Maximum glue usage is the total for all 12 gluers

Appendix A: Potential to Emit - Pre-Press Operations (PA-1)

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Compound	Max Usage gal/yr	VOC Content lb/gal	VOC Emissions ton/yr	HAP			
				Hydroquinone Content (lbs/gal)	Emissions (tons/yr)	Ethylene Glycol Content (lbs/gal)	Emissions (tons/yr)
MX 1813 Developer	240	1.015	0.122	0.000	0.000	0.950	0.114
Ultra Therm Prebake	120	0.764	0.046	0.000	0.000	0.000	0.000
850S Finisher	120	1.018	0.061	0.000	0.000	0.000	0.000
MX1919 Replenisher	600	0.905	0.272	0.000	0.000	0.941	0.282
RA 2000 Developer	48	1.686	0.040	1.058	0.025	0.000	0.000
RA 3000 Automix	48	1.652	0.040	0.000	0.000	0.000	0.000
Total			0.580		0.025		0.396

Methodology

VOC/HAP Emissions

Potential to Emit (PTE) VOC lbs/yr = Maximum usage per year in size x quantity (gal/yr) x (density (lb/gallon) x % VOC content)

Potential to Emit (PTE) VOC ton/yr = PTE VOC (lbs/yr) x 8,760 hours/yr x 1 ton / 2,000 lbs

Potential to Emit (PTE) HAP lbs/yr = Maximum usage per year (gal/yr) x (density (lb/gallon) x % HAP content)

Potential to Emit (PTE) HAP ton/yr = PTE HAP lbs/yr x 8,760 hours/yr x 1 ton / 2,000 lbs

Appendix A: Potential to Emit - Scrap Paper Bailer Cyclones

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

Emission Unit	Outlet Grain Loading Limit gr/acf	Cyclone Air Flow Rate acfm	Control Efficiency (%)	PTE of PM/PM10 After Control (tons/year)	PTE of PM/PM10 before Control (tons/year)
Cyclone (C-1)	0.03	47.050	98%	0.053	2.650
Cyclone (C-3)	0.03	10.800	98%	0.012	0.608
Total				0.065	3.258

PM Emissions

PTE After controls (tons/year) = Outlet Grain Loading (gr/acf) * Air Flow Rate (acfm) * 60 minutes/hour * 1 lb/ 7000gr * 8760 hours/year * 1 ton/2000 lbs

PTE Before Controls (tons/year) = PTE After Controls (tons/year) *1/ (1- Control Efficiency %)

PM=PM₁₀=PM_{2.5}

Particulate emissions are from three (3) bailers, identified as B-1A, B-2, and B-3 and from one (1) paper shredder, identified as PS-1.

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

**Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.695
total for all three boilers (BLR1,

58.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.22	0.22	0.02	2.93	0.16	2.46

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is also filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

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

**Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	6.158E-05	3.519E-05	2.199E-03	5.278E-02	9.970E-05

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total (tons/yr)
Potential Emission in tons/yr	1.466E-05	3.226E-05	4.105E-05	1.114E-05	6.158E-05	5.534E-02

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Potential to Emit from Parts Washers**

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, IN 46621
Permit Renewal No.: F097-26040-00107
Reviewer: Sarah Conner, Ph. D.
Date: 2/2/2009

VOC and HAP Emissions from two (2) parts washers

Unit	Size (gal)	Max. Annual Solvent Usage (gal/yr)	VOC Content (lb/gal)	VOC PTE (ton/yr)
Solvent-based	20	240	7	0.84
Water-based	60	240	0.1	0.012
Total				0.852