



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 8, 2008

RE: Bomarko, Inc. / 099-26783-00021

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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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Bomarko, Inc.**  
**1955 North Oak Road**  
**Plymouth, Indiana 46563**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M099-26783-00021	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 8, 2008  Expiration Date: December 8, 2018

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary waxed and coated paper and foil, roll and sheet stock manufacturing plant.

Source Address:	1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address:	P.O. Box 1510, Plymouth, Indiana 46563
General Source Phone Number:	(574) 936-9901
SIC Code:	2671
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) flexographic rotogravure printing press (ID No. 1-2-P1), constructed in 1970, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (b) One (1) flexographic rotogravure printing press (ID No. 1-2-P2), constructed in 1975, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (c) One (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (d) One (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (e) One (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (f) One (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (g) One (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (h) One (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum

line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);

- (i) One (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (j) One (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;
- (k) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
  - (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
  - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
  - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
  - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
  - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
  - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983 [326 IAC 6-2];
  - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
  - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
  - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
  - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996 [326 IAC 6-2].
- (l) Combustion source flame safety purging on startup.
- (m) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
  - (1) one (1) Safety Kleen cold parts cleaner. [326 IAC 8-3-2]
- (o) 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) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);

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

- (p) Closed loop heating and cooling systems.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (s) 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. [326 IAC 6-3-2]
- (t) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (u) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (v) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (w) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (x) On-site fire and emergency response training approved by the department.
- (y) Natural gas-fired 4-stroke rich-burn emergency generator, with a maximum a maximum natural gas usage rate of 0.25 million British thermal units per hour (MMBtu/hr).
- (z) Other emergency equipment such as stationary fire pumps.
- (aa) Purge double block and bleed valves.
- (bb) Filter or coalescer media changeout.
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (dd) The following activities with emissions equal to or less than the insignificant thresholds:
  - (1) One (1) foil baler in Plant 1;
  - (2) One (1) paper baler in Plant 1, which exhausts to two (2) small baghouses which vent indoors;
  - (3) One (1) baler in Plant 2;
  - (4) Rewinders;
  - (5) Waxers;
  - (6) Eleven (11) wax storage tanks;
  - (7) One (1) ink mix room (emissions are accounted for under printing operations).

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- 
- (a) This permit, M099-26783-00021, 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]**

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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**

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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**

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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**

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

### **B.7 Duty to Provide Information**

- 
- (a) The Permittee shall furnish to IDEM, OAQ, 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**

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

**B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M099-26783-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

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

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

**B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
  
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
  
- (b) 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.19 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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 Permit Revocation [326 IAC 2-1.1-9]

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

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

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

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

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

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

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]

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

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

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

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

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

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

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

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

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

legally required shall be implemented when operation begins.

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

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps**

**C.13 Response to Excursions or Exceedances**

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

- (1) monitoring data;
- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring

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

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
- (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
  - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
  - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
  - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
  - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
  - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983;
  - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
  - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
  - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
  - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996.

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

#### D.1.1 Particulate [326 IAC 6-2-1] [326 IAC 6-2-3] [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3(e), (Particulate Emission Limitations for Sources of Indirect Heating) particulate matter emissions from the 2.14 MMBtu per hour boiler shall not exceed 0.6 pound per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a), particulate matter emissions from the 1.5 MMBtu per hour boiler shall not exceed 0.6 pounds per MMBtu heat input.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (b) One (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (c) One (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (d) One (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (e) One (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (f) One (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
- (g) One (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (h) One (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-1] [326 IAC 8-5-5]

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

- (1) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (2) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (3) the owner or operator installs and operates:

- (a) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
  - (b) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
  - (c) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (4) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.
- (5) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:
- (a) seventy-five percent (75%) for publication rotogravure processes;
  - (b) sixty-five percent (65%) for packaging rotogravure processes; and
  - (c) sixty percent (60%) for flexographic printing processes.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.2.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### **Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

#### D.2.4 Record Keeping Requirement [326 IAC 8-1-10]

Pursuant to 326 IAC 8-1-10 (Compliance Certification, Record keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings) this source uses compliant coatings to comply with the VOC emission limit pursuant to 326 IAC 8-5-5, and shall comply with the certification, record keeping, and reporting requirements of this rule outlined in (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1.

- (1) The name and identification number of each coating, as applied.
- (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in pound of VOC per pound of solids in the coating.
- (3) As new compliant coatings are added to a coating facility, the records shall be updated to include the new coating.

- (4) If use of a coating is discontinued, the records required by 326 IAC 8-1-10 shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
  - (1) one (1) Safety Kleen cold parts cleaner. [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 2-6.1-5(a)(1)]**

**D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-1] [326 IAC 8-3-2]**

Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations) the Safety Kleen cold parts cleaner is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations). Pursuant to this rule, the owner or operator shall:

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

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

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

Source Name: Bomarko, Inc.  
Source Address: 1955 North Oak Road, Plymouth, Indiana 46563  
Mailing Address: P.O. Box 1510, Plymouth, Indiana 46563  
MSOP Permit No.: M099-26783-00021

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Bomarko, Inc.
<b>Address:</b>	1955 North Oak Road
<b>City:</b>	Plymouth, Indiana 46563
<b>Phone #:</b>	1-574-936-9901
<b>MSOP #:</b>	M099-26783-00021

I hereby certify that Bomarko, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Bomarko, Inc. is :

in compliance with the requirements of MSOP M099-26783-00021.

not in compliance with the requirements of MSOP M099-26783-00021.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Addendum to the Technical Support Document (ATSD) for a Minor Source  
Operating Permit (MSOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Bomarko, Inc.</b>
<b>Source Location:</b>	<b>1955 North Oak Road, Plymouth, Indiana 46563</b>
<b>County:</b>	<b>Marshall</b>
<b>SIC Code:</b>	<b>2671</b>
<b>Operation Permit No.:</b>	<b>M099-26783-00021</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

On November 4, 2008, the Office of Air Quality (OAQ) had a notice published in Plymouth Pilot News, Plymouth, Indiana, stating that Bomarko, Inc. had applied for a MSOP Renewal to continue the operation of a waxed and coated paper, and foil, roll, and sheet stock manufacturing plant. The notice also stated that the OAQ proposed to issue a MSOP 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 November 5, 2008, Drew McClay submitted comments to IDEM, OAQ on the draft MSOP 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:**

Drew McClay noticed that there is still a section in the TSD for an *Enforcement Issue*. It appears that the removal of this section from the draft permit was just overlooked when the *Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit* condition was removed from the draft per discussions with IDEM, OAQ on the wax tanks. Is there something that is being referred to Enforcement regarding this permit?

**Response to Comment 1:**

IDEM, OAQ does not make any changes to the original TSD, although the comment is correct. The section in the TSD for *Enforcement Issue* should state that

"There are no pending enforcement actions related to this source."

No changes were made to the TSD as a result of this comment.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed MSOP 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](http://www.idem.in.gov)

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Bomarko, Inc.</b>
<b>Source Location:</b>	<b>1955 North Oak Road, Plymouth, Indiana 46563</b>
<b>County:</b>	<b>Marshall</b>
<b>SIC Code:</b>	<b>2671</b>
<b>Permit Renewal No.:</b>	<b>M099-26783-00021</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Bomarko, Inc. relating to the operation of a waxed and coated paper, and foil, roll, and sheet stock manufacturing plant.

**History**

On July 17, 2008 Bomarko, Inc submitted an application to the OAQ requesting to renew its operating permit. Bomarko, Inc was issued an MSOP (M099-17838-00021) on May 5, 2004.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) flexographic rotogravure printing press (ID No. 1-2-P1), constructed in 1970, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (b) One (1) flexographic rotogravure printing press (ID No. 1-2-P2), constructed in 1975, with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (c) One (1) rotogravure printing press (ID No. 1-2-P3), constructed in 1976, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (d) One (1) rotogravure printing press (ID No. 1-2-P4), constructed in 1979, with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (e) One (1) rotogravure printing press (ID No. 1-2-P5), constructed in 1982, with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (f) One (1) flexographic printing press (ID No. 1-2-P7), constructed in 1988, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (g) One (1) rotogravure printing press (ID No. 1-2-P8), constructed in 1990, with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (h) One (1) flexographic printing press (ID No. 1-2-P9), constructed in 1991, with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting

through one (1) stack (ID No. 1-2-P9-1);

- (i) One (1) flexographic printing press, identified as BFP15, constructed in 2001, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches;
- (j) One (1) flexographic printing press, identified as BFP16, constructed in 2002, with a maximum line speed of 1000 feet per minute and a maximum printing width of 60 inches;
- (k) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
  - (1) one (1) hot water boiler, rated at 0.164 MMBtu per hour, constructed prior to 1983;
  - (2) two (2) hot water boilers, each rated at 0.66 MMBtu per hour, constructed prior to 1983;
  - (3) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
  - (4) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
  - (5) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
  - (6) one (1) boiler, rated at 2.14 MMBtu per hour, constructed prior to 1983 [326 IAC 6-2];
  - (7) one (1) hot water boiler, rated at 2.58 MMBtu per hour, constructed prior to 1983;
  - (8) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
  - (9) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
  - (10) one (1) boiler, rated at 1.5 MMBtu per hour, constructed in 1996 [326 IAC 6-2].
- (l) Combustion source flame safety purging on startup.
- (m) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
  - (1) one (1) Safety Kleen cold parts cleaner. [326 IAC 8-3-2]
- (o) 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) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);

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

- (p) Closed loop heating and cooling systems.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (s) 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. [326 IAC 6-3-2]
- (t) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (u) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (v) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (w) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (x) On-site fire and emergency response training approved by the department.
- (y) Natural gas-fired 4-stroke rich-burn emergency generator, with a maximum a maximum natural gas usage rate of 0.25 million British thermal units per hour (MMBtu/hr).
- (z) Other emergency equipment such as stationary fire pumps.
- (aa) Purge double block and bleed valves.
- (bb) Filter or coalescer media changeout.
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (dd) The following activities with emissions equal to or less than the insignificant thresholds:
  - (1) One (1) foil baler in Plant 1;
  - (2) One (1) paper baler in Plant 1, which exhausts to two (2) small baghouses which vent indoors;
  - (3) One (1) baler in Plant 2;
  - (4) Rewinders;
  - (5) Waxers;
  - (6) Eleven (11) wax storage tanks;
  - (7) One (1) ink mix room (emissions are accounted for under printing operations).

### Emission Units and Pollution Control Equipment Removed From the Source

- (dd) The following activities not previously identified with emissions equal to or less than the insignificant thresholds:
- (1) One (1) 4,000 gallon ethyl acetate underground storage tank;
  - (2) One (1) 4,000 gallon N-propyl acetate underground storage tank;
  - (3) One (1) 4,000 gallon Isopropyl alcohol underground storage tank;
  - (4) One (1) printing press (Press No. 11) in Plant 2; and
  - (5) One (1) six inch printing press (Press No. 12) in Plant 1.

### Existing Approvals

Bomarko, Inc was issued an MSOP (M099-17838-00021) on May 5, 2004.

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.

### Enforcement Issue

IDEM is aware that equipment has been constructed (and/or operated) prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

- (a) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Marshall County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

(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 (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Marshall County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Marshall 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**

<b>Pollutant</b>	<b>tons/year</b>
PM	0.29
PM <sub>10</sub>	1.14
PM <sub>2.5</sub>	1.14
SO <sub>2</sub>	0.09
VOC	54.25
CO	12.86
NO <sub>x</sub>	15.19

<b>HAPs</b>	<b>tons/year</b>
Butane	0.32
Ethane	0.47
Formaldehyde	0.01
Hexane	0.27
Pentane	0.39
Propane	0.24
All other single HAPs	negligible
<b>Total</b>	<b>1.71</b>

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) 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/or 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.

#### **Federal Rule Applicability**

- (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 Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ, are not included in the permit because the printing presses at this source are not publication rotogravure printing presses.
- (c) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit because the boilers at this source are all rated at less than 10 MMBtu per hour.
- (d) 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.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for the Printing and Publishing Industry, Subpart KK, are not included in the permit because this source is not a major source of HAPs, and because the ink used in the printing presses at this source does not contain HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, Subpart OOOO are not included in the permit because this source does not coat fabrics or other textiles and is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Halogenated Solvent Cleaning, Subpart T

are not included in the permit because the solvent used in the Safety Kleen cold parts cleaner does not contain methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, Subpart JJJJ are not included in the permit because the source is not major source of HAPs.

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

#### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source has submitted a Preventive Maintenance Plan (PMP) on December 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

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

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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)**

The source is subject to the requirements of 326 IAC 6-4, because unpaved roads at the source have the potential to emit fugitive particulate emissions. 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.

### **State Rule Applicability – Individual Facilities**

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

The operation of each single unit at the source and all units combined at 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 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

- (a) The requirements of 326 IAC 6-2-3 apply to indirect heating facilities constructed prior to September 21, 1983. Pursuant to 326 IAC 6-2-3 (Emission Limitations for Facilities

Specified in 326 IAC 6-2-1(c)), particulate matter emissions from the 2.14 MMBtu per hour boiler, constructed before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: Pt = Pounds of PM emitted per MMBtu heat input  
C = 50 ug/m<sup>3</sup> (maximum ground level default concentration.)  
a = Plume rise factor = 0.67 (used for Q less than or equal to 1,000 MMBtu/hr heat input)  
h = 34 ft (Stack height in feet).  
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.  
= 2.14 MMBtu/hr  
N = Number of stacks in fuel burning operation.

For the 2.14 MMBtu per hour boiler, Pt is calculated as follows:

$$Pt = \frac{50 \times 0.67 \times 34.0}{76.5 \times 2.14^{0.75} \times 1^{0.25}} = 8.4 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(e), particulate matter emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per MMBtu heat input. Therefore, since this is the most stringent limit, particulate matter emissions from the 2.14 MMBtu per hour boiler shall not exceed 0.6 pound per MMBtu heat input. Potential PM emissions from this facility are less than 0.6 pound per MMBtu heat input, therefore, this facility will comply with 326 IAC 6-2-3.

- (b) The requirements of 326 IAC 6-2-4 apply to indirect heating facilities constructed after September 1, 1983. Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), particulate matter emissions from the 1.5 MMBtu per hour boiler, constructed after September 1, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.  
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.  
Q = 2.14 MMBtu/hr (from existing boiler) + 1.5 MMBtu/hr  
+ 3.0 MMBtu/hr from paper and natural gas-fired boiler (which has since been removed)  
Q = 6.64 MMBtu per hour. (when the 1.5 MMBtu/hr boiler was installed in 1996, the 3.0 MMBtu/hr paper and natural gas-fired boiler had not yet been retired, therefore the 3.0 MMBtu/hr boiler is included in the calculation of Q.)

$$Pt = \frac{1.09}{(6.64)^{0.26}} = 0.67 \text{ pound per MMBtu heat input.}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu per hour, Pt shall not exceed 0.6. Therefore, particulate matter emissions from the 1.5 MMBtu per hour boiler shall not exceed 0.6 pounds per MMBtu heat input. Potential particulate matter

emissions from the 1.5 MMBtu per hour boiler are less than 0.6 pounds per MMBtu, therefore, this boiler will comply with 326 IAC 6-2-4.

For natural gas combustion the PM are calculated as follows:

$$(1 \text{ MMCF}/1000 \text{ MMBtu}) * (1.9 \text{ lb PM/MMCF}) = 0.0019 \text{ lb PM/MMBtu}$$

- (c) The 0.164 MMBtu per hour hot water boiler, the two (2) 0.66 MMBtu per hour hot water boilers, and the 2.58 MMBtu per hour hot water boiler, constructed prior to September 23, 1983, are not subject to this rule because hot water boilers are not indirect heating facilities.

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

- (a) The printing presses at this source are not subject to the requirements of this rule because they do not have particulate emissions.
- (b) The trimmer has a process weight rate less than 100 pounds per hour, therefore, pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate is 0.551 pound per hour.
- (c) The potential particulate emissions from the other units at the source are less than 0.551 pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), they are not subject to this rule.

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

This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions of 25 tons per year or more, which are not otherwise regulated by other provisions of Article 8. None of the printing presses at this source are subject to the requirements of this rule. The four (4) presses identified as 1-2-P1, 1-2-P2, 1-2-P3, and 1-2-P4 were all constructed prior to 1980, therefore, they are not subject to this rule. The remaining presses, identified as 1-2-P5, 1-2-P7, 1-2-P8, 1-2-P9, BFP15, and BFP16 are not subject to this rule because they are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

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

Since this source is located in Marshall County, this rule applies to sources or facilities constructed after November 1, 1980 pursuant to 326 IAC 8-5-1. The two (2) presses identified as 1-2-P1 and 1-2-P2 are not subject to this rule because they were constructed prior to November 1, 1980. Presses 1-2-P3 and 1-2-P4 were also constructed prior to November 1, 1980 but are subject to 326 IAC 8-5-5 per Agreed Order Cause No. A-1580 which requires these units to operate in compliance with the rule. The remaining presses, identified as: 1-2-P4, 1-2-P5, 1-2-P7, 1-2-P8, 1-2-P9, BFP15, and BFP16, are subject to the rule because they were each constructed after November 1, 1980.

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

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (c) the owner or operator installs and operates:
  - (1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;

- (2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
  - (3) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.
- (e) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:
- (1) seventy-five percent (75%) for publication rotogravure processes;
  - (2) sixty-five percent (65%) for packaging rotogravure processes; and
  - (3) sixty percent (60%) for flexographic printing processes.

The coatings used in Presses 1-2-P3 through 1-2-P5, 1-2-P7 through 1-2-P9, and in Presses BFP15 and BFP16 are all water-based coatings and all have VOC emissions equal to 0.09 pound of VOC per pound of solids (see Appendix A, page 2 of 6 for compliance calculations). Therefore, the source is in compliance with the emission limit 0.5 pound of VOC per pound of solids in the ink set forth in 326 IAC 8-5-5.

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

This rule applies to sources that use compliant coatings to comply with VOC emission limits and meet the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Since this source uses compliant coatings to comply with the VOC emission limit pursuant to 326 IAC 8-5-5, the source shall comply with the certification, record keeping, and reporting requirements of this rule.

**326 IAC 8-1-12 (Compliance Certification, Record keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices)**

This rule applies to sources that use control devices to comply with VOC emission limits and meet the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Since this source has removed Press 1-2-P6 and its associated catalytic incinerator, as permitted under First Administrative Amendment No. 099-14912-00021, issued on October 30, 2001, the requirements of this rule no longer apply.

**326 IAC 8-3 (Organic Solvent Degreasing Operations)**

The Safety Kleen cold parts cleaner is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because it was constructed after January 1, 1980 and prior to July 1, 1990. Pursuant to this rule, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The Safety Kleen cold parts cleaner is not subject to the requirements of 326 IAC 8-3-5 because it was constructed prior to July 1, 1990, and is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph Counties.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source commenced operation prior to 1974 and PTE VOC emissions are less than 100 tons per year; therefore, this rule does not apply.

No other 326 IAC Article 8 rules apply.

#### **Recommendation**

The staff recommends to the Commissioner that the MSOP Renewal (M099-26783-00021) be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 17, 2008.

#### **Conclusion**

The operation of this waxed and coated paper, and foil, roll, and sheet stock manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. M099-26783-00021.

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Bomarko, Inc.  
**Address:** 1955 North Oak Road, Plymouth, Indiana 46563  
**MSOP:** 099-26783-00021  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 8/27/2008

Potential To Emit (TPY)	NOx	CO	VOC	SO2	PM	PM10	PM2.5
Printing Press Operations	-	-	53.42	-	-	-	-
*Boiler	15.04	12.63	8.27E-01	9.02E-02	2.86E-01	1.14E+00	1.143
Emergency Generator	0.1436	0.2221	0.0019	0.0000	0.0006	0.0006	0.0006
<b>TERMINAL WIDE TOTALS</b>	<b>15.185</b>	<b>12.856</b>	<b>54.252</b>	<b>0.090</b>	<b>0.286</b>	<b>1.144</b>	<b>1.144</b>

**HAPs Emission Summary**

HAPs - Organics

Total individual HAPs from Boilers and Generator

Acetaldehyde	Acrolein	Benzene	Butane	Dichlorobenzene	Ethane	Formaldehyde	Hexane	Methanol	Pentane	Propane	Toluene
1.77E-04	1.66E-04	4.2E-04	3.16E-01	1.8E-04	4.7E-01	1.3E-02	2.7E-01	1.94E-04	3.9E-01	2.4E-01	5.1E-04

HAPs - Metals

Lead	Barium	Cadmium	Chromium	Molybdenum	Nickel	Vanadium	Zinc	<b>Total</b>
7.52E-05	6.62E-04	1.65E-04	2.11E-04	1.65E-04	3.16E-04	3.46E-04	4.36E-03	<b>1.71E+00</b>



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

**Company Name:** Bomarko, Inc.  
**Address:** 1955 North Oak Road, Plymouth, Indiana 46563  
**MSOP:** 099-26783-00021  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 8/27/2008

Heat Input Capacity                      Potential Throughput  
MMBtu/hr                                      MMCF/yr

34.3                                      300.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.29	1.14	1.14	0.09	15.04	0.83	12.63

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
See following page for HAPs emissions calculations.

MMBtu/hr	Number of Units	MMBtu/hr
0.164	1	0.164
0.66	2	1.32
0.32	3	0.96
0.8	2	1.6
1.08	1	1.08
2.14	1	2.14
2.58	1	2.58
0.3	11	3.3
0.8	1	0.8
0.8	1	0.8
2.8	1	2.8
4	1	4
1.5	1	1.5
4	1	4
1.8	1	1.8
2	1	2
0.8	1	0.8
1.2	1	1.2
1.5	1	1.5

Total MMBtu/hr for all natural gas units      34.344

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

**Company Name:** Bomarko, Inc.  
**Address:** 1955 North Oak Road, Plymouth, Indiana 46563  
**MSOP:** 099-26783-00021  
**Reviewer:** Sarah Conner  
**Date:** 8/27/2008

HAPs - Organics									
Emission Factor in lb/MMcf	Benzene 2.1E-03	Butane 2.10E+00	Dichlorobenzene 1.2E-03	Ethane 3.1E+00	Formaldehyde 7.5E-02	Hexane 1.8E+00	Pentane 2.6E+00	Propane 1.60E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.159E-04	3.16E-01	1.805E-04	4.663E-01	1.128E-02	2.707E-01	3.911E-01	2.407E-01	5.114E-04

HAPs - Metals									
Emission Factor in lb/MMcf	Lead 5.0E-04	Barium 4.40E-03	Cadmium 1.1E-03	Chromium 1.4E-03	Molybdenum 1.10E-03	Nickel 2.1E-03	Vanadium 2.3E-03	Zinc 2.9E-02	Total
Potential Emission in tons/yr	7.520E-05	6.618E-04	1.655E-04	2.106E-04	1.655E-04	3.159E-04	3.459E-04	4.362E-03	1.703E+00

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations  
POTENTIAL EMERGENCY GENERATOR EMISSIONS**

**Company Name:** Bomarko, Inc.  
**Address:** 1955 North Oak Road, Plymouth, Indiana 46563  
**MSOP:** 099-26783-00021  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 8/27/2008

Size: 38 hp  
 Pilot Fuel Type: Natural gas

**Assumptions**

Fuel Heat Content	1050	Btu/ft3	(max per USEPA guidance)
Annual Hours of Operation	500	hrs/yr	
	241.00	ft3/hr	Product literature at full load
Maximum Fuel Usage	120500.00	ft3/yr	
	0.25	MMBTU/hr	Calculated (1)

Pollutant	Emission Factor		Emission Rates			Basis of Estimate	
NOx	2.27	lb/MMBTU	0.57	lbs/hr	<b>0.1436</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
CO	3.51	lb/MMBTU	0.89	lbs/hr	<b>0.2221</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
VOC	2.96E-02	lb/MMBTU	0.01	lbs/hr	<b>0.0019</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
SO2	5.88E-04	lb/MMBTU	0.00	lbs/hr	<b>0.0000</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
PM (condensable)	9.91E-03	lb/MMBTU	0.00	lbs/hr	<b>0.0006</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
PM10 (filterable)	9.50E-03	lb/MMBTU	0.00	lbs/hr	<b>0.0006</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)
PM2.5 (filterable)	9.50E-03	lb/MMBTU	2.40E-03	lbs/hr	<b>0.0006</b>	<b>tpy</b>	AP-42: Table 3.2-3 (8-2000)

Methodology

- (1) Maximum Fuel Usage (MMBTU/hr) = Fuel usage (ft3/hr) \* Fuel heat content (BTU/ft3) / 1000000 BTU/1 MMBTU  
 (2) Pollutant Emission Rate (lbs/hr) = (Pollutant Emission factor, lbs/gallon) x (Fuel consumption, gallons/yr) / (2000 lbs/ton)

**Appendix A: Emission Calculations  
POTENTIAL EMERGENCY GENERATOR HAP EMISSIONS**

**Company Name:** Bomarko, Inc.  
**Address:** 1955 North Oak Road, Plymouth, Indiana 46563  
**MSOP:** 099-26783-00021  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 8/27/2008

Emission Factor in lb/MMBtu	HAPs						Total
	Acetaldehyde 2.8E-03	Acrolein 2.63E-03	Benzene 1.6E-03	Ethane 7.0E-02	Formaldehyde 2.1E-02	Methanol 3.1E-03	
Potential Emission in tons/yr	1.765E-04	1.664E-04	9.995E-05	4.454E-03	1.297E-03	1.936E-04	0.0064

Methodology is the same as previous page.

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