



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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TO: Interested Parties / Applicant
DATE: October 28, 2009
RE: Bemis Company / 167-27050-00033
FROM: Matthew Stuckey, Deputy 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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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(317) 232-8603
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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Bemis Company, Inc.
1350 North Fruitridge Avenue
Terre Haute, Indiana 47804

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T167-27050-00033	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 28, 2009 Expiration Date: October 28, 2014

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary polyethylene film plant including film production, printing, and converting operations.

Source Address:	1350 North Fruitridge Avenue, Terre Haute, Indiana 47804
Mailing Address:	1350 North Fruitridge Avenue, Terre Haute, IN 47804
General Source Phone Number:	(812) 460-6200
SIC Code:	2673, 3079, 3081
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (b) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (c) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (d) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (e) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (f) Flexographic printing press, identified as press #11, constructed in 1986, using oxidation for control, and exhausting to stack 15.
- (g) Flexographic printing press, identified as press #12, constructed in 1986, using oxidation for control, and exhausting to stack 15.
- (h) Flexographic printing press, identified as press #13, constructed in 1987, using oxidation for control, and exhausting to stack 15.

- (i) Flexographic printing press, identified as press #14, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (j) Flexographic printing press, identified as press #15, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (k) Flexographic printing press, identified as press #16, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (l) Flexographic printing press, identified as press #17, constructed in 1990, using oxidation for control, and exhausting to stack 15.
- (m) Flexographic printing press, identified as press #18, constructed in 1990, using oxidation for control, and exhausting to stack 15.
- (n) Flexographic printing press, identified as press #19, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (o) Flexographic printing press, identified as press #20, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (p) Flexographic printing press, identified as press #21, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (q) Flexographic printing press, identified as press #22, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (r) Flexographic printing press, identified as press #23, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14..
- (s) Flexographic printing press, identified as press #24, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (t) Flexographic printing press, identified as press #25, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (u) Flexographic printing press, identified as press #27, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (v) Flexographic printing press, identified as press #28, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (w) Flexographic printing press, identified as press #29, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (x) Flexographic printing press, identified as press #30, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (y) Flexographic printing press, identified as press #31, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (z) Flexographic printing press, identified as press #32, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (aa) Flexographic printing press, identified as press #33, constructed in 2003, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.

- (bb) Flexographic printing press, identified as press #34, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (cc) Flexographic printing press, identified as press #35, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (dd) Flexographic printing press, identified as press #36, constructed in 2004, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ee) Flexographic printing press, identified as press #37, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ff) Flexographic printing press, identified as press #38, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (gg) Flexographic printing press, identified as press #39, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (hh) Flexographic printing press, identified as press #40, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ii) Closed solvent spray type parts washer exhausting to stack 20.
- (jj) Cyrel plate making facility, constructed in 1993, exhausting to stack 23.
- (kk) Catalytic oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 5.
- (ll) Catalytic oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 6.
- (mm) Catalytic oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 7.
- (nn) Catalytic oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 8.
- (oo) Catalytic oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 9.
- (pp) Catalytic oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 10.

- (qq) Catalytic oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29 #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 11.
- (rr) Catalytic oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 12.
- (ss) Regenerative thermal oxidizer, identified as I13, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 10 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 13.
- (tt) Regenerative thermal oxidizer, identified as I14, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 10.0 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 14.
- (uu) Regenerative thermal oxidizer, identified as I15, with a maximum air flow rate of 40000 CFM, and a maximum heat input rating of 7.3 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #11, #12, #13, #14, #15, #16, #17, and/or #18, and exhausting to stack 15.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source does not include any insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

A.4 Part 70 Permit Applicability [326 IAC 6.5-1]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

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

- (a) This permit, T167-27050-00033, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-7-16]

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

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

Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T167-27050-00033 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.

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

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1)]

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted and approved written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS: Presses and Oxidizers

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

- (f) Flexographic printing press, identified as press #11, constructed in 1986, using oxidation for control, and exhausting to stack 15.
- (g) Flexographic printing press, identified as press #12, constructed in 1986, using oxidation for control, and exhausting to stack 15.
- (h) Flexographic printing press, identified as press #13, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (i) Flexographic printing press, identified as press #14, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (j) Flexographic printing press, identified as press #15, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (k) Flexographic printing press, identified as press #16, constructed in 1987, using oxidation for control, and exhausting to stack 15.
- (l) Flexographic printing press, identified as press #17, constructed in 1990, using oxidation for control, and exhausting to stack 15.
- (m) Flexographic printing press, identified as press #18, constructed in 1990, using oxidation for control, and exhausting to stack 15.
- (n) Flexographic printing press, identified as press #19, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (o) Flexographic printing press, identified as press #20, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (p) Flexographic printing press, identified as press #21, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (q) Flexographic printing press, identified as press #22, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (r) Flexographic printing press, identified as press #23, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14..
- (s) Flexographic printing press, identified as press #24, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (t) Flexographic printing press, identified as press #25, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (u) Flexographic printing press, identified as press #27, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (v) Flexographic printing press, identified as press #28, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.

- (w) Flexographic printing press, identified as press #29, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (x) Flexographic printing press, identified as press #30, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (y) Flexographic printing press, identified as press #31, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (z) Flexographic printing press, identified as press #32, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (aa) Flexographic printing press, identified as press #33, constructed in 2003, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (bb) Flexographic printing press, identified as press #34, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (cc) Flexographic printing press, identified as press #35, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (dd) Flexographic printing press, identified as press #36, constructed in 2004, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ee) Flexographic printing press, identified as press #37, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ff) Flexographic printing press, identified as press #38, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (gg) Flexographic printing press, identified as press #39, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (hh) Flexographic printing press, identified as press #40, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (kk) Catalytic oxidizer, identified as 15, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 5.
- (ll) Catalytic oxidizer, identified as 16, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 6.
- (mm) Catalytic oxidizer, identified as 17, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 7.
- (nn) Catalytic oxidizer, identified as 18, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 8.

- (oo) Catalytic oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 9.
- (pp) Catalytic oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 10.
- (qq) Catalytic oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 11.
- (rr) Catalytic oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 12.
- (ss) Regenerative thermal oxidizer, identified as I13, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 10 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 13.
- (tt) Regenerative thermal oxidizer, identified as I14, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 10.0 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 14.
- (uu) Regenerative thermal oxidizer, identified as I15, with a maximum air flow rate of 40000 CFM, and a maximum heat input rating of 7.3 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #11, #12, #13, #14, #15, #16, #17, and/or #18, and exhausting to stack 15.

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

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

D.1.1 Prevention of Significant Deterioration - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 2-2, PSD/SPM 167-21257-00033, issued on November 13, 2006, and SPM 167-23850-00033, issued on May 22, 2007, the PSD BACT for Bemis Company, Inc. shall be the following:

- (a) Whenever any of presses #11, #12, #13, #14, #15, #16, #17, or #18 is applying VOC containing materials, the exhaust from that press shall be vented through the operating Plant 1 oxidation control system consisting of oxidizer I15. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.

- (b) Whenever any of presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #37, #38, #39 or #40 is applying VOC containing materials, the exhaust from that press shall be vented through the operating Plant 2 oxidation control system consisting of oxidizers I5, I6, I7, I8, I9, I10, I11, I12, I13, and I14. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (c) The capture system for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #37, #38, #39 and #40 shall be considered to achieve one-hundred percent (100%) capture efficiency if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
- (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
 - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
 - (3) The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (4) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDOs shall be into the enclosure.
 - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
 - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:

Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

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

Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through T167-6182-00033, issued on June 28, 2004, the following conditions apply:

- (a) The annual VOC usage on press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following

equation: (Printing VOC usage) * (1 - overall control efficiency) + Cleanup VOC loss \leq 39.99 tons. Compliance with this condition shall make this press not subject to the provisions of 326 IAC 2-2, Prevention of Significant Deterioration (PSD).

- (b) Whenever press #36 is applying VOC containing materials, the press exhaust shall be vented through the operating oxidation control system. The press shall maintain a minimum overall control efficiency of 80.75% for VOC emissions.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture system for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40, in combination with the catalytic/regenerative thermal oxidation system, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12) and regenerative thermal oxidizers (I13, I14, and I15) shall maintain a minimum destruction efficiency of 90%.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Testing requirements for the destruction efficiency of the thermal and catalytic oxidizers are as follows:
 - (1) Within one hundred eighty (180) days after start-up of oxidizers, the Permittee shall conduct a performance test to verify the VOC destruction efficiency as per Conditions D.1.1, D.1.2, and D.1.3, utilizing methods as approved by the Commissioner.
 - (2) Testing of the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12), to verify their destruction efficiencies, was performed on April 17, 2006.
 - (3) Testing of the oxidizer (I13) to verify the destruction efficiency was performed on May 15, 2007.
 - (4) Testing of the oxidizer (I14) to verify the destruction efficiency was performed on May 6, 2009.
 - (5) Testing of the oxidizer (I15) to verify the destruction efficiency was performed on March 31, 2009.
 - (6) The destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.
- (b) Testing requirements for the capture efficiency of the flexographic presses are as follows:
 - (1) Testing of presses #11 and #12, to verify their system captures efficiencies, was performed on June 27, 2005.
 - (2) Testing of presses #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, and #35, to verify their capture efficiencies, was performed on January 3 - 4, 2007.

- (3) Testing of presses #37 and #38, to verify their capture efficiency, was performed on April 17, 2006.
 - (4) Testing of press #36, to verify its capture efficiency, was performed on October 27, 2004.
 - (5) Testing of press #39 and #40, to verify their capture efficiency, was performed on December 11, 2007.
 - (6) The capture efficiency test shall be repeated for a press in this section whenever a reconfiguration or change in the design of that press is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of these presses, which include any of the following:
 - (A) The addition of print station to a press;
 - (B) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers);
or
 - (C) Changing the static duct pressure.
- (c) Testing shall be conducted in accordance with Section C - Performance Testing

D.1.5 Oxidizer Grouping

- (a) Regenerative thermal oxidizers (RTOs) I13, I14, and catalytic oxidizers I5, I6, I7, I8, I9, I10, I11, I12 have been interconnected with a common press exhaust plenum to form an oxidization control system for plant 2. As a control system, the captured VOC emissions from any operating press are exhausted to this common press exhaust plenum and primarily controlled by the RTOs.
- (b) To prevent an uncontrolled release of captured VOC emissions:
 - (1) Before any press can operate, the total expected flow rate from all operating presses must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
 - (2) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
 - (3) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidization control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If the oxidization control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidation system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidation capacity is brought online or other presses are shutdown.
 - (4) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
 - (5) A log of all such oxidation control system malfunctions shall be kept and made

available to the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

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

D.1.6 Oxidizer Temperature [326 IAC 2-2]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each oxidizer in the control system used to control emissions from presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40. For the purpose of this condition, continuous means no less than once per minute. The operating temperature for the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizers (I13, I14, and I15) is the combustion zone temperature. The output of this system shall be recorded as a three (3) hour average.
- (b) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid performance test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average operating temperature that is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring [326 IAC 2-2]

- (a) The Permittee shall establish the appropriate monitoring parameter for each press (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM) from the most recent performance test that demonstrates compliance with the VOC limits in Condition D.1.1, D.1.2, and D.1.3.
- (b) The Permittee shall maintain the following monitoring parameter value for Press #36 for each day the press is operating as an indication that capture is being attained: Duct pressure or fan amperage - The Permittee shall maintain the flow indicator parameter at a value at least eight-five percent (85%) of the value as established during the most recent performance test.
- (c) The Permittee shall maintain one of the following monitoring parameter values for each press enclosed in a PTE for each day the press is operating as an indication that 100 percent capture is being attained:
 - (1) Differential pressure - The Permittee shall maintain a differential pressure at a value of negative (-) 0.007 inches of water column or less, or
 - (2) Differential pressure - The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.

- (d) The established monitoring parameter value shall be observed at least once per day for each day the press is operating.

D.1.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40:

- (a) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-) 0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than negative (-) 0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated.

	Indicator #1	Indicator #2	Indicator #3
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

(b) Monitoring Approach For Unenclosed Presses

	Indicator # 1	Indicator #2	Indicator #3 ^a
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks, including: between color dryer flow; and tunnel oven flow.	Use a smoke stick or equivalent approach to assure that the dryer is negative to the surrounding atmosphere.
II. Indicator Range	An excursion is defined as any finding that the integrity of the exhaust system has been compromised.	An excursion is defined as any finding that any interlock is inoperative.	General overflow of smoke should be into the dryer web slot or application area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Press can not be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak free ductwork will assure that all of the normally captured exhaust will	Properly operating interlocks will assure that the process will be shut down if there is insufficient flow or the bypass damper is open to atmosphere.	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application area.

	reach the control device. Inspections will identify problems.		
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable
C. QA/QC Practices and Criteria	Not applicable	Not applicable	Not applicable
D. Monitoring Frequency	Quarterly	Annually.	Whenever the location of the dryer is disrupted. (This may not be necessary for two piece dryers.)
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations	Not applicable
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

^a Indicator #3 is only necessary for unenclosed presses with variable placement settings for the between color dryer cans.

(c) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliant performance test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
A. Data Representativeness	Any temperature-monitoring device employed to measure the Catalyst bed inlet temperature shall be accurate to within 1.0% of temperature measured or ± 1 °C, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20 °F.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection - annually • Internal inspection - annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Three hours.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analysis and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(d) Monitoring Approach For Regenerative Thermal Oxidizers:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.

	Indicator #1	Indicator #2	Indicator #3
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliant performance test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^{\circ}\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External Inspection - annually Internal inspection - annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Three hours.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

D.1.9 Monitoring

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or

Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11, and I12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, D.1.3, D.1.6, and D.1.7 the Permittee shall maintain records in accordance with (1), (2), and (3) below.
- (1) The continuous inlet temperature to the catalyst bed (reduced to a three-hour average basis) for the catalytic oxidizers I5, I6, I7, I8, I9, I10, I11, and I12 and the three (3) hour average inlet temperature to the catalyst bed used to demonstrate compliance during the most recent compliant performance test.
 - (2) The continuous combustion zone temperature (reduced to a three-hour average basis) for the oxidizers I13, I14, and I15 and the three (3) hour average combustion zone temperature used to demonstrate compliance during the most recent compliant performance test.
 - (3) Daily record of the monitoring parameter value (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM).
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for the press.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period from press #36 using methods identified in condition D.1.2.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of inspections or samples. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).

- (d) All records shall be maintained in accordance with the Section C - General Record Keeping Requirements.

D.1.11 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.1.2 shall be submitted quarterly to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS: Closed Solvent Spray Parts Washer

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

- (a) Closed solvent spray type parts washer exhausting to stack 20.

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

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

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

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Avenue, Terre Haute, Indiana 47804
Mailing Address: 1350 North Fruitridge Avenue, Terre Haute, IN 47804
Part 70 Permit No.: T167-27050-00033

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:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Avenue, Terre Haute, Indiana 47804
Mailing Address: 1350 North Fruitridge Avenue, Terre Haute, IN 47804
Part 70 Permit No.: T167-27050-00033

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Avenue, Terre Haute, Indiana 47804
Mailing Address: 1350 North Fruitridge Avenue, Terre Haute, IN 47804
Part 70 Permit No.: T167-27050-00033
Facility: Press #36
Parameter: VOC emissions
Limit: Less than 39.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER:

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Bemis Company, Inc.
 Source Address: 1350 North Fruitridge Avenue, Terre Haute, Indiana 47804
 Mailing Address: 1350 North Fruitridge Avenue, Terre Haute, IN 47804
 Part 70 Permit No.: T167-27050-00033

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Significant Operating Permit
Renewal

Source Name:	Bemis Company, Inc.
Source Location:	1350 North Fruitridge Avenue Terre Haute, IN 47804-4218
County:	Vigo
SIC Code:	2673, 3081, 3079
Permit Modification No.:	167-27050-00033
Permit Reviewer:	Michael S. Brooks

On July 17, 2009, the Office of Air Quality (OAQ) had a notice published in the Terre Haute Tribune Star in Vigo County in Indiana, stating that Bemis Company, Inc. had applied for a Part 70 operating permit renewal for a stationary polyethylene film plant including film production, printing, and converting operations. The notice also stated that OAQ proposed to issue an operating permit renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

Comment #1

The presses #11 - #18 listed under Section A.2 and Section D.1 no longer vent through stacks 1 - 4.

Response to Comment #1

Section A.2 and Section D.1 have been corrected as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

...

- (f) Flexographic printing press, identified as press #11, constructed in 1986, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (g) Flexographic printing press, identified as press #12, constructed in 1986, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (h) Flexographic printing press, identified as press #13, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (i) Flexographic printing press, identified as press #14, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (j) Flexographic printing press, identified as press #15, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.

- (k) Flexographic printing press, identified as press #16, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (l) Flexographic printing press, identified as press #17, constructed in 1990, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (m) Flexographic printing press, identified as press #18, constructed in 1990, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- ...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS: Presses and Oxidizers

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

- (f) Flexographic printing press, identified as press #11, constructed in 1986, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (g) Flexographic printing press, identified as press #12, constructed in 1986, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (h) Flexographic printing press, identified as press #13, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (i) Flexographic printing press, identified as press #14, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (j) Flexographic printing press, identified as press #15, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (k) Flexographic printing press, identified as press #16, constructed in 1987, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (l) Flexographic printing press, identified as press #17, constructed in 1990, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- (m) Flexographic printing press, identified as press #18, constructed in 1990, using oxidation for control, and exhausting to ~~stacks 1, 2, 3, 4, and/or~~ stack 15.
- ...

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

Comment #2

Regenerative Thermal Oxidizer I13 has a heat input rating of 10MMBtu.

Response to Comment #2

This has been corrected as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

...

- (ss) Regenerative thermal oxidizer, identified as I13, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of ~~8-6~~**10** million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 13.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS: Presses and Oxidizers

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

...

- (ss) Regenerative thermal oxidizer, identified as I13, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of ~~8-6~~**10** million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 13.

...

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

Comment #3

Bemis requests clarification regarding Condition C.10 Instrument Specifications.

Response to Comment #3

If an analog instrument, used to measure a parameter related to the operation of an air pollution control device, is required by a condition of the permit it 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. 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.

Comment #4

Bemis would like Section D.1 facility description changed to read "includes all units except for" then list the units not included.

Response to Comment #4

Facility descriptions are standard and shall remain consistent throughout all permits issued by IDEM/OAQ, There will be no changes made to the permit as a result of this comment.

Comment #5

Bemis requests a source wide emission limitation for Hazardous Air Pollutants (HAPs) to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year for a combination of HAPs.

Response to Comment #5

The limitation is not necessary as the potential to emit of HAPs is significantly below 10/25.

Comment #6

Bemis requests Condition D.1.4(a) Testing Requirements should be replaced with specific test dates.

Response to Comment #6

IDEM/OAQ does not normally include prior test completion dates in the permit; however, completion dates have been added as requested by the source. The permit shall be changed as follows:

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Testing requirements for the destruction efficiency of the thermal and catalytic oxidizers are as follows:
- ~~(1) Testing of the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12), to verify their destruction efficiencies, was performed on April 17, 2006.~~
 - ~~(2) Testing of the oxidizer (I13) to verify the destruction efficiency was performed on May 15, 2007.~~
 - ~~(3) Within one hundred eighty (180) days after start-up of oxidizers (I14 and I15), the Permittee shall conduct a performance test to verify the VOC destruction efficiency as per Conditions D.1.1, D.1.2, and D.1.3, utilizing methods as approved by the Commissioner.~~
 - (1) Within one hundred eighty (180) days after start-up of oxidizers (I14 and I15), the Permittee shall conduct a performance test to verify the VOC destruction efficiency as per Conditions D.1.1, D.1.2, and D.1.3, utilizing methods as approved by the Commissioner.**
 - (2) Testing of the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12), to verify their destruction efficiencies, was performed on April 17, 2006.**
 - (3) Testing of the oxidizer (I13) to verify the destruction efficiency was performed on May 15, 2007.**
 - (4) Testing of the oxidizer (I14) to verify the destruction efficiency was performed on May 6, 2009.**
 - (5) Testing of the oxidizer (I15) to verify the destruction efficiency was performed on March 31, 2009.**
 - (46) The destruction efficiency testing shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration.**

Comment #7

Bemis requests Condition D.1.6 Oxidizer Temperature be changed to reflect the completion of testing.

Response to Comment #7

This has been corrected as follows:

D.1.6 Oxidizer Temperature [326 IAC 2-2]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each oxidizer in the control system used to control emissions from presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27,

#28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40. For the purpose of this condition, continuous means no less than once per minute. The operating temperature for the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizers (I13, I14, and I15) is the combustion zone temperature. The output of this system shall be recorded as a three (3) hour average.

- (b) ~~From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of RTOs I13, I14, and I15 is below 1600°F. A three (3) hour average operating temperature for RTOs I13, I14, and I15 that is below is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- (eb) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid performance test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (ec) ~~On and after the date the approved performance test results are available,~~ The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the **three (3)** hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average operating temperature that is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Comment #8

Bemis requests Condition D.1.7 Parametric Monitoring be changed for better clarity.

Response to Comment #8

IDEM/OAQ feels the changes purposed by Bemis will enhance clarity and the permit shall be changed as follows:

D.1.7 Parametric Monitoring [326 IAC 2-2]

- (a) The Permittee shall establish the appropriate monitoring parameter for each press (duct pressure, or fan amperage, or differential pressure, or other parameter as approved by IDEM) from the most recent performance test that demonstrates compliance with the VOC limits in Condition D.1.1, D.1.2, and D.1.3.
- (b) **The Permittee shall maintain the following monitoring parameter value for Press #36 for each day the press is operating as an indication that capture is being attained: Duct pressure or fan amperage - The Permittee shall maintain the flow indicator parameter at a value at least eight-five percent (85%) of the value as established during the most recent performance test.**
- (b) (c) The Permittee shall maintain one of the following monitoring parameter values for each press **enclosed in a PTE** for each day the press is operating as an indication that 100 percent capture is being attained:

- ~~(1)~~ ~~Duct pressure or fan amperage~~ - The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test, or
 - ~~(2)~~ (1) Differential pressure - The Permittee shall maintain a differential pressure at a value of **negative (-)** 0.007 inches of water column or less, or
 - ~~(3)~~ (2) Differential pressure - The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.
- (e) (d) The established monitoring parameter value shall be observed at least once per day for each day the press is operating.

Comment #9

Bemis requests several language changes to its CAM Plan.

Response to Comment #9

IDEM/OAQ agrees and the permit shall be changed as follows:

D.1.8 Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following compliance assurance monitoring requirements for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40:

- (a) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than negative (-) 0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than negative (-) 0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.

	Indicator #1	Indicator #2	Indicator # 3
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

(b) Monitoring Approach For Unenclosed Presses

	Indicator # 1	Indicator #2	Indicator #3 ^a
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks, including: -between color dryer flow; and	Use a smoke stick or equivalent approach to assure that the dryer is negative to the surrounding atmosphere.

~tunnel oven flow.			
II. Indicator Range	An excursion is defined as any finding that the integrity of the exhaust system has been compromised.	An excursion is defined as any finding that any interlock is inoperative.	General overflow of smoke should be into the dryer web slot or application area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Press can not be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the process will be shut down if there is insufficient flow or the bypass damper is open to atmosphere.	Monitoring approach will assure the dryer is set to properly contain supply air and the overairflow is into the application area.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable
C. QA/QC Practices and Criteria	Not applicable	Not applicable	Not applicable
D. Monitoring Frequency	Quarterly	Annually.	Whenever the location of the dryer is disrupted. (This may not be necessary for two piece dryers.)
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations	Not applicable
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

^a Indicator #3 is only necessary for unenclosed presses with variable placement settings for the between color dryer cans.

(c) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliance demonstration compliant performance test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the Catalyst bed inlet temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^\circ\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^\circ\text{F}$.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection - annually • Internal inspection - annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Three hours.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analysis and corrective actions taken in response to excursions.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(d) Monitoring Approach For Regenerative Thermal Oxidizers:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliance demonstration compliant performance test .	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^\circ\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^\circ\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External Inspection - annually Internal inspection - annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Three hours.	Not applicable.	Not applicable.

	Indicator #1	Indicator #2	Indicator #3
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

Comment #10

There is a missing space in Condition D.1.10(a)(2).

Response to Comment #10

The error has been corrected as follows:

D.1.10 Record Keeping Requirements

-
- (a) To document compliance with Condition D.1.1, D.1.3, D.1.6, and D.1.7 the Permittee shall maintain records in accordance with (1), (2), and (3) below.
 - ...
 - (2) The continuous combustion zone temperature (reduced to a three-hour average basis) for the oxidizers I13, I14, ~~and I15~~ and I15 and the three (3) hour average combustion zone temperature used to demonstrate compliance during the most recent compliant performance test.
 - ...

Comment #11

On the TSD, only a select four insignificant activities were listed. These should either be deleted with a statement that there are no specifically regulated insignificant activities, or the list should be expanded to include all the insignificant activities listed in the permit application and subsequent discussions.

Response to Comment #11

No changes will be made to the TSD because the IDEM/OAQ prefer that the Technical Support Document reflect the permit that was on public notice.

Comment #12

All changes made to the Renewal Permit should clearly state they also change the underlying TSD.

Response to Comment #12

No changes will be made to the TSD because the IDEM/OAQ prefer that the Technical Support Document reflect the permit that was on public notice. Anything listed in this addendum suffices as a change to the TSD.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Bemis Company, Inc.
Source Location:	1350 North Fruitridge Avenue Terre Haute, IN 47804
County:	Vigo
SIC Code:	2673, 3081, 3079
Permit Renewal No.:	T167-27050-00033
Permit Reviewer:	Michael S. Brooks

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Bemis Company, Inc., relating to the operation of a stationary polyethylene film plant including film production, printing, and converting operations.

History

On September 30, 2008, Bemis Company, Inc. submitted an application to the OAQ requesting to renew its operating permit.

Permitted Emission Units and Pollution Control Equipment

- (a) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (b) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (c) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (d) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (e) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (f) Flexographic printing press, identified as press #11, constructed in 1986, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (g) Flexographic printing press, identified as press #12, constructed in 1986, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (h) Flexographic printing press, identified as press #13, constructed in 1987, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (i) Flexographic printing press, identified as press #14, constructed in 1987, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (j) Flexographic printing press, identified as press #15, constructed in 1987, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.

- (k) Flexographic printing press, identified as press #16, constructed in 1987, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (l) Flexographic printing press, identified as press #17, constructed in 1990, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (m) Flexographic printing press, identified as press #18, constructed in 1990, using oxidation for control, and exhausting to stacks 1, 2, 3, 4, and/or stack 15.
- (n) Flexographic printing press, identified as press #19, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (o) Flexographic printing press, identified as press #20, constructed in 1990, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (p) Flexographic printing press, identified as press #21, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (q) Flexographic printing press, identified as press #22, constructed in 1991, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (r) Flexographic printing press, identified as press #23, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14..
- (s) Flexographic printing press, identified as press #24, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (t) Flexographic printing press, identified as press #25, constructed in 1994, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (u) Flexographic printing press, identified as press #27, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (v) Flexographic printing press, identified as press #28, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (w) Flexographic printing press, identified as press #29, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (x) Flexographic printing press, identified as press #30, constructed in 1997, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (y) Flexographic printing press, identified as press #31, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (z) Flexographic printing press, identified as press #32, constructed in 2000, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (aa) Flexographic printing press, identified as press #33, constructed in 2003, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (bb) Flexographic printing press, identified as press #34, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.

- (cc) Flexographic printing press, identified as press #35, constructed in 2001, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (dd) Flexographic printing press, identified as press #36, constructed in 2004, using oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ee) Flexographic printing press, identified as press #37, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ff) Flexographic printing press, identified as press #38, constructed in 2006, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (gg) Flexographic printing press, identified as press #39, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (hh) Flexographic printing press, identified as press #40, constructed in 2007, using oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, 12, 13, and/or stack 14.
- (ii) Closed solvent spray type parts washer exhausting to stack 20.
- (jj) Cyrel plate making facility, constructed in 1993, exhausting to stack 23.
- (kk) Catalytic oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 5.
- (ll) Catalytic oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 6.
- (mm) Catalytic oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 7.
- (nn) Catalytic oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 8.
- (oo) Catalytic oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 9.
- (pp) Catalytic oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 10.
- (qq) Catalytic oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29 #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 11.

- (rr) Catalytic oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 3.5 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 12.
- (ss) Regenerative thermal oxidizer, identified as I13, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 8.6 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 13.
- (tt) Regenerative thermal oxidizer, identified as I14, with a maximum air flow rate of 55000 CFM, and a maximum heat input rating of 10.0 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #36, #37, #38, #39, and/or #40, and exhausting to stack 14.
- (uu) Regenerative thermal oxidizer, identified as I15, with a maximum air flow rate of 40000 CFM, and a maximum heat input rating of 7.3 million BTU per hour for the supplemental fuel, capable of controlling emissions from presses #11, #12, #13, #14, #15, #16, #17, and/or #18, and exhausting to stack 15.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) Four (4) catalytic oxidizers identified as I1, I2, I3, and I4 and exhausting respectively through Stacks S1, S2, S3, and S4, each with a maximum heat input capacity of 3.0 million BTU per hour for the supplemental fuel, interconnected to form an oxidation control system capable of controlling emissions from presses #11, #12, #13, #14, #15, #16, #17, and/or #18.

Insignificant Activities

- (a) 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.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM source.
- (d) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source.

Existing Approvals

Since the issuance of Part 70 Operating Permit No. 167-6182-00033 on June 28, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Source Modification 167-19667-00033, issued on May 2, 2005;
- (b) Significant Permit Modification 167-19669-00033, issued on June 20, 2005;

- (c) Significant Source Modification 167-21605-00033, issued on January 5, 2006;
- (d) Significant Permit Modification 167-21603-00033, issued on January 20, 2006;
- (e) Significant Source Modification 167-20981-00033, issued on September 18, 2006;
- (f) Significant Permit Modification 167-21257-00033, issued on November 13, 2006;
- (g) Significant Source Modification 167-23761-00033, issued on April 30, 2007;
- (h) Significant Permit Modification 167-23850-00033, issued on May 22, 2007; and
- (i) Significant Permit Modification 167-26552-00033, issued on October 6, 2008.

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

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are confidential and not included as an appendix of this document.

County Attainment Status

The source is located in Vigo County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable 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 PM2.5.

- (a) Ozone Standards
 - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties 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, Hamilton, Hancock,

Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5} Standards**
Vigo County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules is July 15, 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 PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Vigo 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 (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	6.31
PM ₁₀	6.31
SO ₂	0.50
VOC	2104.90
CO	69.76
NO _x	83.04

HAPs	tons/year
Total	<10/25

The Permittee has agreed that this source is major for Part 70 (326 IAC 2-7) and Prevention of Significant Deterioration (PSD) (326 IAC 2-2) for VOC.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/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.
- (d) Since this type of operation is not one (1) 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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1
PM ₁₀	1
SO ₂	0
VOC	732
CO	10
NO _x	12
HAP	Not Reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

CAM:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to flexographic printing presses 11 - 25 and 27 - 40 for VOC. Monitoring requirements to satisfy CAM have been incorporated into the renewal permit. See the compliance Determination and

Monitoring Requirements section of this TSD for the detailed CAM requirements for presses 11 - 25 and 27 - 40.

NSPS:

- (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 flexographic printing presses at this source are not subject to the requirements of the New Source Performance Standard for Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, (40 CFR 60.430, Subpart QQ), because Bemis Company, Inc. does not perform publication rotogravure printing.
- (c) The storage tanks at this source are not subject to the requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, (40 CFR 60, Subpart Kb), because they are all smaller than the 40 cubic meter threshold (10,567 gallons).

NESHAP:

- (a) 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.
- (b) The flexographic printing presses at this source are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for the Printing and Publishing Industry, (40 CFR 63, Subpart KK), because Bemis Company, Inc. is not a major source of Hazardous Air Pollutants (HAPs).
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Halogenated Solvent Cleaning, (40 CFR 63, Subpart T), because Bemis Company, Inc. is not a major source of Hazardous Air Pollutants (HAPs) and because the solvent utilized is not halogenated.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, (40 CFR 63, Subpart JJJJ), because Bemis Company, Inc. is not a major source of Hazardous Air Pollutants (HAPs).

State Rule Applicability - Entire Source

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

The source was initially constructed prior to the August 7, 1977 rule applicability date. Pursuant to 326 IAC 2-2 (PSD), this source is a major stationary source since it has the potential to emit greater than 250 tons per year (tpy) of VOC. The source had several modifications after the August 7, 1977 rule applicability date. The original construction and modification timeline is outlined as follows:

- (a) Presses #2, 8, and 9:
Installed prior to the PSD applicability date of August 7, 1977.
- (b) Presses #1 and 10:
Installed in 1980; PTE less than 250 tpy each.

- (c) Presses #11 and 12:
Installed in 1986; pursuant to PSD/SPM 167-19669-00033, issued on June 20, 2005, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (d) Presses #13, 14, 15, and 16:
Installed in 1988; pursuant to CP 84-1669, issued on November 25, 1987, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (e) Presses #17 and 18:
Installed in 1990; pursuant to CP 84-1842, issued on April 6, 1990, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (f) Presses #19 and 20:
Installed in 1990; pursuant to CP 84-1896, issued on November 10, 1990, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (g) Presses #21 and 22:
Installed in 1991; pursuant to CP 167-2146, issued on October 22, 1991, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (h) Presses #23, 24, and 25:
Installed in 1995; pursuant to CP 167-3392, issued on April 11, 1994, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (i) Presses #27, 28, 29, and 30:
Installed in 1997; pursuant to CP 167-V014-00033, issued on May 30, 1997, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (j) Presses #31 and 32:
Installed in 2000; pursuant to SSM 167-11568-00033, issued on February 1, 2000, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (k) Press #33:
Installed in 2003; pursuant to SSM 167-16521-00033, issued on April 10, 2003, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (l) Presses #34 and 35:
Installed in 2001; pursuant to SSM 167-12790-00033, issued on January 23, 2001, and as modified by PSD/SPM 167-21257-00033, issued on November 13, 2006, BACT requirements detailed below.
- (m) Press #36:
Installed in 2004; pursuant to SSM 167-18122-00033, issued on May 3, 2004, no BACT requirements; VOC input limits for PSD avoidance detailed below.

- (n) Presses #37 and 38:
Installed in 2006; pursuant to SSM 167-21605-00033, issued on January 5, 2006, and as modified by SPM 167-23850-00033, issued on May 22, 2007, BACT requirements detailed below.
- (o) Presses #39 and 40:
Installed in 2007; pursuant to SSM 167-23761-00033, issued on April 30, 2007, BACT requirements detailed below.

Therefore, pursuant to 326 IAC 2-2, the PSD BACT for Bemis Company shall be the following:

- (a) Whenever any of presses #11, #12, #13, #14, #15, #16, #17, or #18 is applying VOC containing materials, the exhaust from that press shall be vented through the operating Plant 1 oxidation control system consisting of oxidizer I15. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (b) Whenever any of presses #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #37, #38, #39 or #40 is applying VOC containing materials, the exhaust from that press shall be vented through the operating Plant 2 oxidation control system consisting of oxidizers I5, I6, I7, I8, I9, I10, I11, I12, I13, and I14. Each press shall have a capture system efficiency of 100%. The oxidation control system shall have a minimum destruction efficiency of 95%.
- (c) The capture system for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #33, #34, #35, #37, #38, #39 and #40 shall be considered to achieve onehundred percent (100%) capture efficiency if the system meets the following criteria for a Permanent or Temporary Total Enclosure under EPA Method 204:
 - (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
 - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
 - (3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
 - (5) All access doors and windows whose areas are not included in (3) and are not included in the calculation in (4) shall be closed during routine operation of the process.
 - (6) All VOC in the enclosure emissions must be captured and contained for discharge through its respective control system.

Where:

Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

Compliance with these conditions shall satisfy the requirements of 326 IAC 2-2, Prevention of Significant Deterioration.

Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through T167-6182-00033, issued on June 28, 2004, the following conditions apply:

- (a) The annual VOC usage on press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous twelve (12) months. Compliance shall be documented using the following equation: $(\text{Printing VOC usage}) * (1 - \text{overall control efficiency}) + \text{Cleanup VOC loss} \leq 39.99 \text{ tons}$.
- (b) Whenever press #36 is applying VOC-containing materials, the press exhaust shall be vented through the operating oxidation control system. A minimum overall control efficiency of 80.75% for VOC emissions shall be maintained.

Compliance with these conditions shall make press #36 not subject to the provisions of 326 IAC 2-2, Prevention of Significant Deterioration (PSD).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 and every year after because the source has the potential to emit greater than two hundred fifty (250) tons per year of volatile organic compounds. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

State Rule Applicability – Individual Facilities

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)

This source is not subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), it does not have the potential to emit particulate matter greater than one hundred (100) tons per year and actual emissions are less than ten (10) tons per year.

326 IAC 8-1-6 (General VOC Reduction Requirements)

This rule is applicable to VOC emission units that were constructed after January 1, 1980, have potential emissions greater than 25 tons per year, and are not otherwise regulated by other provisions of Article 8.

- (a) The following emission units are not subject to 326 IAC 8-1-6 because they are subject to 326 IAC 8-5-5: Press #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40.
- (b) Presses #2, 8, and 9 were constructed prior to January 1, 1980, and, therefore, are not subject to 326 IAC 8-1-6 because of the construction date.
- (c) Press #1 and Press #10 are both subject to the requirements of 326 IAC 8-1-6. However, pursuant to T167-6182-00033, issued on June 28, 2004, it has been determined that BACT at the time these presses were installed would have most likely been no emission control. The PTE of each press is equivalent to 212 tons per year. Any change or modification which increases the potential to emit shall require prior OAQ approval.

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

Pursuant to 326 IAC 8-3-1(a)(2) and (b)(2) the Closed Solvent Spray parts washer is subject to 326 IAC 8-3-2 and 326 IAC 8-3-5. The Closed Solvent Spray parts washer was constructed after July 1, 1990. Therefore, the owner or operator of the closed solvent spray parts washer shall:

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

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

Pursuant to 326 IAC 8-3-1(a)(2) and (b)(2) the Closed Solvent Spray parts washer is subject to 326 IAC 8-3-2 and 326 IAC 8-3-5. The Closed Solvent Spray parts washer was constructed after July 1, 1990. Therefore, the owner or operator of the closed solvent spray parts washer shall ensure that the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

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

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

- (a) The following flexographic printing presses are subject to the requirements of 326 IAC 8-5-5 because they were constructed after November 1, 1980: Press #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40.

Pursuant to 326 IAC 8-5-5(e) (Graphic Arts Operations), the minimum overall control efficiency is 60% for flexographic operations. Additionally, Bemis is not required to meet the solvent VOC content limitations in 326 IAC 8-5-5(c) because the design destruction efficiency is above the 90% minimum specified in 326 IAC 8-5-5(c)(3)(C). Sufficient oxidation capacity shall be in operation at all times these printing presses are in operation, in order to comply with this limit.

- (b) Presses #2, 8, and 9 were constructed prior to November 1, 1980 and are located in Vigo County. Therefore, these presses are not subject to the requirements of 326 IAC 8-5-5.

Compliance Determination and Monitoring Requirements

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

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

The compliance determination requirements applicable to the presses and oxidizers are as follows:

- (a) Testing Requirements
 - (1) The capture efficiency testing shall be repeated for a press whenever a reconfiguration or change in the design of that press is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of these presses, which include any of the following:
 - (A) The addition of print station to a press;
 - (B) Increasing or decreasing the volumetric flow rate from the dryer (e.g, by changing the size of press fans/motors or removal or derating of dryers);
or
 - (C) Changing the static duct pressure.
 - (2) Within one hundred eighty (180) days after start-up of oxidizers the Permittee shall conduct a performance test to verify the VOC destruction efficiency as per Conditions D.1.1, D.1.2, and D.1.3, utilizing methods as approved by the Commissioner.
 - (3) The destruction efficiency testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) Oxidizer Grouping

Regenerative thermal oxidizer (RTO) I15 has been interconnected with a common press exhaust plenum to form an oxidization control system for Plant 1. As a control system, the captured VOC emissions from any operating press are exhausted to this common press exhaust plenum.

Regenerative thermal oxidizers (RTOs) I13, I14, and catalytic oxidizers I5, I6, I7, I8, I9, I10, I11, and I12 have been interconnected with a common press exhaust plenum to form an oxidization control system. As a control system, the captured VOC emissions from any operating press are exhausted to this common press exhaust plenum and primarily controlled by the RTOs.

To prevent an uncontrolled release of captured VOC emissions:

- (1) Before any press can operate, the total expected flow rate from all operating presses, in the respective oxidation control system, must be less than or equal to the total maximum flow rate capacity of all operating oxidizers in the oxidation control system.
- (2) The combined exhaust flow of all the presses in operation shall not exceed the combined airflow capacity of the oxidizers that are in operation at any time.
- (3) In the event of an oxidizer malfunction that could result in the uncontrolled release of captured VOC emissions, the oxidizer shall be immediately removed from the oxidization control system and the press exhaust flow handled by that oxidizer diverted to the other operating oxidizer(s) in the control system. If the oxidization control system no longer has capacity to handle the exhaust flow from the operating presses, presses are to be shut down until the total press exhaust flow is less than or equal to the operating oxidation system capacity. Any press shut down in response to an oxidizer failure can be restarted as soon as additional oxidation capacity is brought online or other presses are shutdown.
- (4) In the event of a T-damper malfunction that could result in the uncontrolled release of captured VOC emissions, the connected press shall be immediately shut down.
- (5) A log of all such oxidation control system malfunctions shall be kept and made available to the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and, if facility intervention is required, a description of the corrective action(s).

These requirements are required to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 PSD (Prevention of Significant Deterioration), and 326 IAC 2-7 (Part 70).

The compliance monitoring requirements applicable to presses and oxidizers are as follows:

- (a) Oxidizer Temperature
 - (1) A continuous monitoring system shall be calibrated, maintained, and operated for measuring operating temperature of each oxidizer in the control system used to control emissions from presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40. For the purpose of this condition, continuous means no less than once per minute. The operating temperature for the catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11 and I12) is the catalyst bed inlet temperature and the operating temperature for the regenerative thermal oxidizers (I13, I14, and I15) is the combustion zone temperature. The output of this system shall be recorded as a three (3) hour average.
 - (2) From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C -Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of RTOs I13, I14, and I15 is below 1600°F. A three (3) hour average operating temperature for RTOs I13, I14, and I15 that is below 1600°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (3) The Permittee shall determine the three (3) hour average operating temperature of each oxidizer in the control system from the most recent valid performance test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
 - (4) On and after the date the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average operating temperature of any oxidizer in the control system is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test. A three (3) hour average operating temperature that is below the three (3) hour average operating temperature as observed during the most recent, approved, compliant performance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall maintain one (1) of the following monitoring parameter values for each press for each day the press is operating as an indication that 100 percent capture is being attained:
- (1) Duct pressure or fan amperage: The Permittee shall maintain the flow indicator parameter at a value at least 85 percent of the value as established during the most recent performance test; or
 - (2) Differential pressure: The Permittee shall maintain a differential pressure at a value of - 0.007 inches of water column or less; or
 - (3) Differential pressure: The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.

The established monitoring parameter value shall be observed at least once per day for each day the press is operating.

- (c) **Monitoring**
The Permittee shall conduct quarterly inspections of all components relating to the capture system for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (I5, I6, I7, I8, I9, I10, I11, and I12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (d) 40 CFR Part 64
 The Permittee shall comply with the following compliance assurance monitoring requirements for presses #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #27, #28, #29, #30, #31, #32, #34, #35, #36, #37, #38, #39 and #40:

(1) Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure has been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than -0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than -0.007" w.c.) can be used as the indicator if such differential is demonstrated as adequate to satisfy the permanent total enclosure with Method 204 criteria. Alternatively, a three hour average value can be used as the indicator range.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	The Permittee must have valid data from at least 90 percent of the hours during which the process operated.

	Indicator #1	Indicator #2	Indicator # 3
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.
D. Monitoring Frequency	Quarterly	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable	Not applicable if using any measured value as the indicator; Three hours if using 3-hour average as the indicator.
E. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

(2) Monitoring Approach For Unenclosed Presses

	Indicator # 1	Indicator #2	Indicator #3 ^a
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks, including: <ul style="list-style-type: none"> • between color dryer flow; and • tunnel oven flow. 	Use a smoke stick or equivalent approach to assure that the dryer is negative to the surrounding atmosphere.
II. Indicator Range	An excursion is defined as any finding that the integrity of the exhaust system has been compromised.	An excursion is defined as any finding that any interlock is inoperative.	General overflow of smoke should be into the dryer web slot or application area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Press can not be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak free ductwork will assure that all of the normally	Properly operating interlocks will assure that the process will be shut down if there is insufficient flow or the bypass damper is open to	Monitoring approach will assure the dryer is set to properly contain supply air and the overflow is into the application area.

	captured exhaust will reach the control device. Inspections will identify problems.	atmosphere.	
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable
C. QA/QC Practices and Criteria	Not applicable	Not applicable	Not applicable
D. Monitoring Frequency	Quarterly	Annually.	Whenever the location of the dryer is disrupted. (This may not be necessary for two piece dryers.)
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations	Not applicable
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of Inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	Quarterly

^a Indicator #3 is only necessary for unenclosed presses with variable placement settings for the between color dryer cans.

(3) Monitoring Approach For Catalytic Oxidizers

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature.	Work practice/inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representativeness	Any temperature-monitoring device employed to measure the Catalyst bed inlet temperature shall be accurate to within 1.0% of temperature measured or ± 1 °C, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by IDEM prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20 °F.	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> • External inspection - annually • Internal inspection - annually. 	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Three hours.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of dates of catalyst sampling, initials of person conducting sampling, catalyst analysis and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Quarterly	Annually.	For each performance test conducted.	Annually.

(4) Monitoring Approach For Regenerative Thermal Oxidizers:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as any 3-hour period when the average operating temperature is less than the average operating temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1.0% of temperature measured or $\pm 1^\circ\text{C}$, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^\circ\text{F}$.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External Inspection - annually Internal inspection - annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Three hours.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

These monitoring conditions are necessary because the presses and oxidizers must operate properly to ensure compliance with 40 CFR Part 64 (CAM), 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 PSD (Prevention of Significant Deterioration), and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 30, 2008.

Conclusion

The operation of this stationary polyethylene film plant, including film production, printing, and converting operations, shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T167-27050-00033.



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dan Rose
Bemis Company
1350 N Fruitridge Avenue
Terre Haute, IN 47804

DATE: October 28, 2009

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

SUBJECT: Final Decision
Title V
167-27050-00033

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Brian Wells, Responsible Official
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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October 28, 2009

TO: Vigo County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Bemis Company
Permit Number: 167-27050-00033

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 10/28/2009 Bemis Company, Inc 167-27050-00033 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Dan R Rose Bemis Company, Inc 1350 N Fruitridge Ave Terre Haute IN 47804-1716 (Source CAATS) (CONFIRM DELIVERY)									
2		Brian Wells Plant Mgr Bemis Company, Inc 1350 N Fruitridge Ave Terre Haute IN 47804-1716 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)									
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)									
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)									
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)									
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)									
9		George Needham Vigo County Air Pollution Control 103 South Third St. Terre Haute IN 47807 (Local Official)									
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