



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 6, 2009

RE: Berry Plastics Corporation / 163-27114-00106

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Shawn Burns
Environmental, Health and Safety Supervisor
Berry Plastics Corporation
101 Oakley Street
Evansville, IN 47710

January 6, 2009

Re: 163-27114-00106
First Notice-Only Change to
M163-22999-00106

Dear Shawn Burns:

Berry Plastics Corporation was issued a Minor Source Operating Permit (MSOP) Renewal No. M163-22999-00106 on November 9, 2007 for an injection molded plastic packaging company located at 101 Oakley Street, Evansville, Indiana. On November 3, 2008, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of new equipment. The detail of the new equipment is as follows:

- (a) One (1) thermoform machine, identified as TFE#8, constructed in 2007, with a maximum process capacity of 1,800 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally.
- (b) One (1) thermoform machine, identified as TFE#10, constructed in 2008, with a maximum process capacity of 6,000 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally.
- (c) One (1) thermoform machine, identified as TFE#12, constructed in 2008, with a maximum process capacity of 4,500 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally.
- (d) Two (2) UV cure dry offset ink printers, identified as TPE 50 and TPE 51, constructed in 2009.

Integral Part of the Process Determination

The Permittee has submitted the following information to justify why the cyclone dust collection systems, equipped on each of the thermoform machines, identified as TFE#8, TFE#10, and TFE#12 should be considered integral parts of these thermoform machines:

- (a) The operation of the cyclone dust collection system results in a positive net economic effect because it enables the plastics forming operations to recycle excess materials that did not form into plastic and results in at least a 95% decrease in plastic forming material use over what it would be if there were no collection and recycling equipment operating.
- (b) The dust collectors located at the facility are all passive dust collection-filtering devices. All transfer of the raw material and the recycled material is done with pneumatic conveying. The pneumatic conveying is achieved using a vacuum pump. In order to operate the vacuum pump, an integral cyclone must be operated to prevent the vacuum pump from becoming fouled by the resin rendering it inoperable. Therefore, the cyclone is necessary to the passive dust collection system.

IDEM, OAQ has evaluated the justifications and agreed that the cyclone dust collection system will be considered as an integral part of the injection molding and thermoforming operations. Therefore, the permitting level has been determined using the potential to emit after the cyclone dust control system. The passive dust collection-filtering devices shall operate at all times when the injection molding and thermoforming operations are in operation.

Emission Calculations

IDEM has reviewed the PTE calculations submitted by the source and determined them to be complete for the purpose of this notice only change. The PTE calculations have been included with this cover letter as 'Attachment A'. In addition, the summary of source-wide potential emissions after the issuance of this notice only change is also included with this cover letter as 'Attachment B'.

Level Determination of the Permit Revision

The addition of these units to the permit is considered a notice-only change, since the potential emissions of the regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-6.1-6(g)(4) and 326 IAC 2-6.1-6(d)(10), respectively. The uncontrolled potential emissions of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3.

Pursuant to the provisions of 326 IAC 2-6.1-6(d)(13), the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) The new equipment has been added to permit.
- (b) On December 16, 2007, rule revisions to 326 IAC 2-1.1-9.5 and 326 IAC 2-6.1-7 were finalized allowing for ten (10) year permit terms on MSOP renewals. These rule revisions also require source to submit MSOP renewal application 120 (which was 90 before the revisions) calendar days before the expiration of date of their MSOP. The permittee requested IDEM to extend the permit term through this notice only change. Therefore, the permit term has been extended to ten (10) years. In addition, 90 calendar days has been changed to 120 calendar days in Condition B.13 - Permit Renewal. These changes to the permit are considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(6), since it incorporates newly applicable requirements as a result of a change in applicability.
- (c) The contract between the Local Agency and IDEM will expire on December 31, 2008. The Local Agency no longer has effective authority to implement state and federal requirements for IDEM. Therefore, IDEM has removed all references to the Local Agency from the permit. The Permittee must submit all reports, notices, applications, and any other required submittals to IDEM.

The Permittee should note that the Local Agency could have its own requirements beyond the state and federal requirements contained in this permit. Please contact the Local Agency for further information.

A.2 Emission Units and Pollution Control Equipment Summary

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

- (d) **One (1) thermoform machine, identified as TFE#8, constructed in 2007, with a maximum process capacity of 1,800 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;**

- (e) **One (1) thermoform machine, identified as TFE#10, constructed in 2008, with a maximum process capacity of 6,000 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;**
- (f) **One (1) thermoform machine, identified as TFE#12, constructed in 2008, with a maximum process capacity of 4,500 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;**
- (dg) ...
- (eh) ...
- (fi) ...
- (gj) ...
- (hk) ...
- (l) **Two (2) UV cure dry offset ink printers, identified as TPE 50 and TPE 51, constructed in 2009;**
- (im) ...
- (jn) ...
- (ko) ...

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

- (a) This permit, M163-22999-00106, is issued for a fixed term of ~~five ten~~ (510) 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.13 Permit Renewal [326 IAC 2-6.1-7]

...

- (b) A timely renewal application is one that is:
 - (1) Submitted at least **one hundred twenty** ~~ninety (90)~~ (120) days prior to the date of the expiration of this permit; and
 - (2) ...
- (c) ...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ...
- (d) One (1) thermoform machine, identified as TFE#8, constructed in 2007, with a maximum process capacity of 1,800 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
 - (e) One (1) thermoform machine, identified as TFE#10, constructed in 2008, with a maximum process capacity of 6,000 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
 - (f) One (1) thermoform machine, identified as TFE#12, constructed in 2008, with a maximum process capacity of 4,500 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
 - (dg) ...
- ...

D.1.3 Particulate Matter (PM)

The cyclone dust control systems shall be in operation and control emissions from the injection molding machines, #1-52, thermoforming machines, lines #1-7, TFE#8, TFE#10 and TFE#12, and five (5) extruders, identified as extruder numbers 1-5, at all times that the emission units are in operation.

...

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit. A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mehul Sura, of my staff, at 317-234-5377 or 1-800-451-6027, and ask for extension 4-5377.

Sincerely,



Iryn Calitung, Section Chief
Permits Branch
Office of Air Quality

Berry Plastics Corporation
Evansville, Indiana
Permit Reviewer: Mehul Sura

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Notice-Only Change No. 163-27114-00106

Attachments: Updated Permit
Attachment A
Attachment B

mns

cc: File - Vanderburgh County
Vanderburgh County Health Department
U.S. EPA, Region V
Air Compliance Section
IDEM Southwest Regional Office
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section

David Howard
Cornerstone Environmental, Health and Safety, Inc.
880 Lennox Ct
Zionsville, IN 46077



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Berry Plastics Corporation
101 Oakley Street
Evansville, Indiana 47710**

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

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

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

Operation Permit No.: M163-22999-00106	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 9, 2007 Expiration Date: November 9, 2017

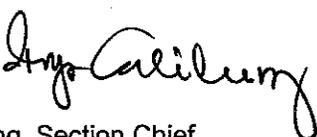
First Notice Only Change No: 163-27114-00106	
Issued by:  Iryn Calilung, Section Chief Office of Air Quality	Issuance Date: January 6, 2009 Expiration Date: November 9, 2017

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

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

The Permittee owns and operates a stationary molded plastic packaging plant.

Source Address:	101 Oakley Street, Evansville, Indiana 47710
Mailing Address:	P.O. Box 959, Evansville, IN 47706-0959
General Source Phone Number:	(812) 424-2904
SIC Code:	3089
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Fifty-three (53) injection-molding machines, with a combined maximum throughput of 18 tons per hour, which utilize a cyclone dust collection system for particulate control and do not vent to an exhaust stack. These injection-molding machines consist of:
1. one (1) unit, identified as #34, rated at 660 pounds resin per hour, installed in 1972;
 2. three (3) units, identified as #5, #8, and #29, rated at 550, 704, and 550 lb/hr, respectively, installed in 1978;
 3. one (1) unit, identified as #4, rated at 550 lb/hr, installed in 1980;
 4. one (1) unit, identified as #1, rated at 704 lb/hr, installed in 1983;
 5. three (3) units, identified as #10, #20, and #35, rated at 704, 704 and 660 lb/hr, respectively, installed in 1984;
 6. four (4) units, identified as #2, #13, #22, and #24, rated at 701, 704, 330, and 330 lb/hr, respectively, installed in 1985;
 7. two (2) units, identified as #17 and #18, rated at 330 and 704 lb/hr, respectively, installed in 1987;
 8. one (1) unit, identified as #26, rated at 330 lb/hr, installed in 1988;
 9. one (1) unit, identified as #23, rated at 330 lb/hr, installed in 1989;
 10. four (4) units, identified as #6, #7, #14, and #19, each rated at 704 lb/hr and installed in 1990;
 11. three (3) units, identified as #27, #28, and #39, rated at 330, 330, and 660 lb/hr, respectively, installed in 1992;
 12. one (1) unit, identified as #9, rated at 704 lb/hr, installed in 1994;
 13. one (1) unit, identified as #43, rated at 880 lb/hr, installed in 1996;
 14. one (1) unit, identified as #47, rated at 660 lb/hr, installed in 1997;
 15. one (1) unit, identified as #49, rated at 1100 lb/hr, installed in 1998;
 16. three (3) units, identified as #45, #46, and #50, each rated at 1,100 lb/hr and installed in 1999;

17. four (4) units, identified as #3, #37, #52, and #53, rated 770, 660, 1,100, and 1,100 lb/hr, respectively, installed in 2000; and
 18. two (2) units, identified as #25 and #54, rated at 440 and 330 lb/hr, respectively, installed in 2001.
 19. eight (8) units, identified as #11, #12, #15, #16, #40, #41, #42, and #51, rated at 440, 440, 770, 770, 1,100, 1,100, 1,100, and 1,100 lb/hr, respectively, installed in 2002;
 20. one (1) unit, identified as #48, rated at 880 lb/hr, installed in 2003;
 21. two (2) units, identified as #32 and #44, rated at 242 and 880 lb/hr, respectively, installed in 2004;
 22. two (2) units, identified as #30 and #33, rated at 330 and 550 lb/hr, respectively, installed in 2005; and
 23. three (3) units, identified as #21, #31, and #38, rated at 242, 242, and 1,100 lb/hr, respectively, constructed in 2006.
- (b) One (1) Thermoforming Machine, identified as Line #1, constructed in 2001, rated at 3300 lbs/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack;
- (c) Six (6) Thermoforming Machines, each rated at 4000 lbs/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack, consisting of:
1. one (1) unit identified as Line #2, installed in 2002;
 2. one (1) unit identified as Line #3, installed in 2003;
 3. one (1) unit identified as Line #4, installed in 2004;
 4. one (1) unit identified as Line #5, installed in 2006; and
 5. two (2) units identified as Line #6 and Line #7, installed in 2005.
- (d) One (1) thermoform machine, identified as TFE#8, constructed in 2007, with a maximum process capacity of 1,800 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
- (e) One (1) thermoform machine, identified as TFE#10, constructed in 2008, with a maximum process capacity of 6,000 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
- (f) One (1) thermoform machine, identified as TFE#12, constructed in 2008, with a maximum process capacity of 4,500 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;
- (g) Five (5) extruders, identified as Extruder numbers 1 - 5, constructed in 2007, with a combined maximum capacity of 1,231 lb/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack;
- (h) Twenty-two (22) ultraviolet cure ink printers, each with a maximum capacity of 18 plastic parts per minute, which have no air pollution control devices and do not vent to a stack, consisting of:
1. two (2) units identified as TPE15 and TPE17, installed in 2002;
 2. six (6) units identified as TPE22-TPE24, TPE39, TPE40 and TPE42, installed in 2003;
 3. three (3) units identified as TPE19-TPE21, installed in 2004;

4. seven (7) units identified as TPE27-TPE33 and TPE41, installed in 2005;
and
 5. four (4) units identified as TPE35-TPE38, installed in 2006.
- (i) Six (6) silkscreen machines, rated at 0.20 pounds of ink per hour, identified as PSE05, OSE06, OSE08, OSE10, OSE11, OSE04, constructed prior to 1980, which have no air pollution control devices, and vent thru an exhaust stack to the outside air. Each silkscreen machine has its own natural gas burner for process heat;
- (j) Sixteen (16) ultraviolet cure ink printers, with a maximum annual ink use of 90 tons per year, which have no air pollution control devices. Nine (9) of which vent through an exhaust stack to the outside air, seven (7) do not vent to an exhaust stack. Each ultraviolet cure ink printer has its own natural gas burner for process heat. These ultraviolet cure ink printers consist of:
24. three (3) units, identified as TPE08, TPE10, TPE11, installed in 1985;
 25. one (1) unit, identified as TPE09, installed in 1986;
 26. three (3) units, identified as TPE01-TPE03, installed in 1990;
 27. one (1) unit, identified as TPE04, , installed in 1993;
 28. one (1) unit, identified as TPE05, installed in 1994;
 29. one (1) unit, identified as TPE06, installed in 1996;
 30. one (1) unit, identified as TPE07, installed in 1997;
 31. two (2) units, identified as TPE13, and TPE16, installed in 1998;
 32. one (1) unit, identified as TPE14, installed in 2000; and
 33. two (2) units, identified as TPE12 and TPE18, installed in 2001.
- (k) One (1) ultraviolet cure ink Gallus printer line, consisting of 10 stations, constructed in 2007;
- (l) Two (2) UV cure dry offset ink printers, identified as TPE 50 and TPE 51, constructed in 2009;
- (m) Fifteen (15) solvent parts washers, with a combined maximum capacity of 2.04 tons of cleaning solvent per year, identified as numbers 1 – 15, constructed in 2002. Four (4) of which vent through an exhaust stack to the outside air, the other eleven (11) do not vent to an exhaust stack;
- (n) One (1) 500 gallon above ground hydraulic oil storage tank, constructed in 1989; and
- (o) One (1) 550 gallon above ground virgin solvent storage tank, constructed in 1989.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M163-22999-00106, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

- (a) All terms and conditions of permits established prior to M163-22999-00106 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

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

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

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

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

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

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

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to by the date specified on the invoice.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 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 2-6.1-5(a)(2)]

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

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Fifty-three (53) injection-molding machines, with a combined maximum throughput of 18 tons per hour, which utilize a cyclone dust collection system for particulate control and do not vent to an exhaust stack. These injection-molding machines consist of:
1. one (1) unit, identified as #34, rated at 660 pounds resin per hour, installed in 1972;
 2. three (3) units, identified as #5, #8, and #29, rated at 550, 704, and 550 lb/hr, respectively, installed in 1978;
 3. one (1) unit, identified as #4, rated at 550 lb/hr, installed in 1980;
 4. one (1) unit, identified as #1, rated at 704 lb/hr, installed in 1983;
 5. three (3) units, identified as #10, #20, and #35, rated at 704, 704 and 660 lb/hr, respectively, installed in 1984;
 6. four (4) units, identified as #2, #13, #22, and #24, rated at 701, 704, 330, and 330 lb/hr, respectively, installed in 1985;
 7. two (2) units, identified as #17 and #18, rated at 330 and 704 lb/hr, respectively, installed in 1987;
 8. one (1) unit, identified as #26, rated at 330 lb/hr, installed in 1988;
 9. one (1) unit, identified as #23, rated at 330 lb/hr, installed in 1989;
 10. four (4) units, identified as #6, #7, #14, and #19, each rated at 704 lb/hr and installed in 1990;
 11. three (3) units, identified as #27, #28, and #39, rated at 330, 330, and 660 lb/hr, respectively, installed in 1992;
 12. one (1) unit, identified as #9, rated at 704 lb/hr, installed in 1994;
 13. one (1) unit, identified as #43, rated at 880 lb/hr, installed in 1996;
 14. one (1) unit, identified as #47, rated at 660 lb/hr, installed in 1997;
 15. one (1) unit, identified as #49, rated at 1100 lb/hr, installed in 1998;
 16. three (3) units, identified as #45, #46, and #50, each rated at 1,100 lb/hr and installed in 1999;
 17. four (4) units, identified as #3, #37, #52, and #53, rated 770, 660, 1,100, and 1,100 lb/hr, respectively, installed in 2000; and
 18. two (2) units, identified as #25 and #54, rated at 440 and 330 lb/hr, respectively, installed in 2001.
 19. eight (8) units, identified as #11, #12, #15, #16, #40, #41, #42, and #51, rated at 440, 440, 770, 770, 1,100, 1,100, 1,100, and 1,100 lb/hr, respectively, installed in 2002;
 20. one (1) unit, identified as #48, rated at 880 lb/hr, installed in 2003;
 21. two (2) units, identified as #32 and #44, rated at 242 and 880 lb/hr, respectively, installed in 2004;
 22. two (2) units, identified as #30 and #33, rated at 330 and 550 lb/hr, respectively, installed in 2005; and
 23. three (3) units, identified as #21, #31, and #38, rated at 242, 242, and 1,100 lb/hr, respectively, constructed in 2006.
- (b) One (1) Thermoforming Machine, identified as Line #1, constructed in 2001, rated at 3300 lbs/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack;
- (c) Six (6) Thermoforming Machines, each rated at 4000 lbs/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack, consisting of:
1. one (1) unit identified as Line #2, installed in 2002;

<p>2. one (1) unit identified as Line #3, installed in 2003;</p> <p>3. one (1) unit identified as Line #4, installed in 2004;</p> <p>4. one (1) unit identified as Line #5, installed in 2006; and</p> <p>5. two (2) units Identified as Line #6 and Line #7, installed in 2005.</p> <p>(d) One (1) thermoform machine, identified as TFE#8, constructed in 2007, with a maximum process capacity of 1,800 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;</p> <p>(e) One (1) thermoform machine, identified as TFE#10, constructed in 2008, with a maximum process capacity of 6,000 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;</p> <p>(f) One (1) thermoform machine, identified as TFE#12, constructed in 2008, with a maximum process capacity of 4,500 pounds per hour of plastic resin, utilizing a cyclone dust collection system as integral part of the process and for particulate control, which vents internally;</p> <p>(g) Five (5) extruders, identified as Extruder numbers 1 - 5, constructed in 2007, with a combined maximum capacity of 1,231 lb/hr, utilizing a cyclone dust collection system for particulate control and not venting to an exhaust stack;</p> <p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>

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

D.1.1 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Emissions (326 IAC 6-3-2) (lb/hr)
injection molding machines, #1-52	36,000	28.43
thermoforming machines, Lines #1-7	28,000	24.03
extruders, #1-5	1,231	2.96

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

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

Compliance Determination Requirements

D.1.3 Particulate Matter (PM)

The cyclone dust control systems shall be in operation and control emissions from the injection molding machines, #1-52, thermoforming machines, lines #1-7, TFE#8, TFE#10 and TFE#12, and five (5) extruders, identified as extruder numbers 1-5, at all times that the emission units are in operation.

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

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the cyclone dust collection systems controlling the injection molding machines, #1-52, thermoforming machines, Lines #1-7, and extruders, #1-5, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, 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.1.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). 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 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirement

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of the cyclone dust collection systems controlling the injection molding machines, #1-52, thermoforming machines, Lines #1-7, and extruders, #1-5, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Fifteen (15) solvent parts washers, with a combined maximum capacity of 2.04 tons of cleaning solvent per year, identified as numbers 1 – 15, constructed in 2002. Four (4) of which vent through an exhaust stack to the outside air, the other eleven (11) do not vent to an exhaust stack;

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

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

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

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation), the owner or operator of a cold cleaning facility shall:

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

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

Pursuant to 326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

- (a) The owner or operator of the cold cleaner degreaser shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent 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) The owner or operator of a cold cleaning facility 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
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Berry Plastics Corporation
Address:	101 Oakley Street
City:	Evansville, Indiana 47710
Phone #:	(812) 424-2904
MSOP #:	M163-22999-00106

I hereby certify that Berry Plastics Corporation is :

still in operation.

no longer in operation.

I hereby certify that Berry Plastics Corporation is :

in compliance with the requirements of MSOP M163-22999-00106.

not in compliance with the requirements of MSOP M163-22999-00106.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Name: Berry Plastics Corporation
Source Address: 101 Oakley Street, Evansville, Indiana 47710
Mailing Address: P.O. Box 959, Evansville, IN 47706-0959
MSOP No.: M163-22999-00106

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

Attachment A

**Emissions Calculation submitted by Berry Plastics Corporation for
Notice-Only Change No. 163-27114-00106**

Berry Plastics Corporation
Evansville, IN
Emission Calculations for Thermoforming

Potential to Emit Criteria Air Pollutants from the Thermoforming Machines Processing Polypropylene at a 505° F Melt Temperature

Berry Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	PM			VOC		
			⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
TFE 8	PP	1,800	34.5	0.06	0.27	80.3	0.14	0.63
TFE 10	PP	4,500	34.5	0.16	0.68	80.3	0.36	1.58
TFE 12	PP	6,000	34.5	0.21	0.91	81.3	0.49	2.14
Totals		12,300		0.42	1.86	241.90	0.99	4.35

Hazardous Air Pollutant Emission Factors from Processing Polypropylene at a 505° F Melt Temperature

HAP Constituent	CAS #	⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)
Formaldehyde	50-00-0	0.74
Acrolein	107-02-8	0.01
Acetaldehyde	75-07-0	0.46
Propionaldehyde	123-38-6	0.05

Berry Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	Formaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/yr)	Acetaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)
TFE 8	PP	1,800	0.0058	0.0001	0.0036	0.0004
TFE 10	PP	4,500	0.0146	0.0002	0.0091	0.0010
TFE 12	PP	6,000	0.0194	0.0003	0.0121	0.0013
Totals			0.040	0.001	0.025	0.003

Notes and Methodology

⁽¹⁾ Emission factors for PM, VOC and HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505° F and reactor impact copolymer was used as the emission factor

Berry Plastics
 Evansville, IN
 Emission Calculations for Printing and Cleanup

Potential Emissions for Cleanup Solvent Usage

Area of Cleanup Solvent Usage	Product Name	Manufacturer	Estimated Max Usage (lb/hr)	Density (lbs/gal)	VOC Content (wt%)	VOC Emissions (tons/yr)	Xylene (tons/yr)	Toluene (tons/yr)	Cumene (tons/yr)
Thermoform (3 new machines)	BP 627	Ulrich Chemical	0.14	7.28	100%	0.59	0.15	0.04	0.02
Printer Cleanup (2 new printers)	L-1751	Superior	0.600	6.83	75.8%	1.99	-	-	-

Ink Usage	Product Name	Manufacturer	Estimated Max Usage (lbs/hr)	VOC Content (wt%)	VOC Emissions (tons/yr)
Thermoform	Various UV Curable Inks	Sun	2.48	1%	0.11

Berry Plastics Corporation
 Evansville, IN
 Summary of PTE of Modification

Summary of Potential Emissions of Modification

Emission Unit or Process	PM (tons/yr)	PM ₁₀ (tons/yr)	VOC (tons/yr)	NO _x (tons/yr)	CO (tons/yr)	Formaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Acetaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)
Thermoforming	1.86	1.86	4.35	-	-	0.04	0.00	0.02	0.00
Printing	-	-	0.11	-	-	-	-	-	-
Printer Cleaning	-	-	1.99	-	-	-	-	-	-
Thermoform Cleaning	-	-	0.59	-	-	-	-	-	-
Total	1.86	1.86	7.04	0.00	0.00	0.04	0.00	0.02	0.00

Attachment B

**Summary of source-wide potential emissions after the issuance of the notice only
change No. 163-27114-00106**

Emission Calculations Summary

Company Name: Berry Plastics Corporation
Address City IN Zip: 101 Oakley Street, Evansville, IN 47710
Notice-Only Change No. 163-27114-00106
Reviewer: Mehul Sura

Potential Emissions (tons/year)									
Emissions Generating Activity									
Pollutant	Injection Molding Machines	Thermoforming Lines 1-7	Thermoforming Machines TFE 8, TFE 10 and TFE 12	Printers (TPE 50 and TPE 51)	Extruders	Printing Operations	Cleaning Operations	Natural Gas Usage (MMCF/Year)	TOTAL
PM	3.27	3.27	1.86	0.00	3.94	0.00	0.00	0.08	12.42
PM10	3.27	3.27	1.86	0.00	3.94	0.00	0.00	0.08	12.42
PM2.5	3.27	3.27	1.86	0.00	3.94	0.00	0.00	0.08	12.42
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.02	1.02
VOC	16.32	9.52	4.35	2.69	0.19	2.59	38.64	0.06	74.35
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.86	0.86
total HAPs	0.40	0.50	0.07	0.00	0.00	0.11	6.82	0.02	7.92
worst case single HAP	0.24	0.29	0.04	0.00	0.00	0.06	0.00	0.02	0.65

PM10=PM2.5