



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 11, 2009

RE: Graphic Packaging International, Inc. / 091-27970-00099

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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Patrick Combs  
Graphic Packaging International, Inc.  
115 Koomler Drive  
La Porte, IN 46350

June 11, 2009

Re: 091-27970-00099  
Third Notice-Only Change to  
M091-24283-00099

Dear Mr. Combs:

Graphic Packaging International, Inc. was issued a Minor Source Operating Permit (MSOP) No. M091-24283-00099 on August 29, 2007 for a stationary food industry printed packaging production process located at 115 Koomler Drive, LaPorte, Indiana. On May 21, 2009, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of a coater unit, to be installed at an existing lithographic press. The addition of this unit to the permit is considered a notice-only change, since the potential emissions of 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/unlimited potential to emit 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.

The applicant also requested that the permit be revised to correct a typographical error in Appendix A of the previously issued permit. The identification numbers for Press 1 and Press 3 were reversed. Appendix A of the previously issued permit has not been changed. However, the attached calculations to this Notice-Only Change reflect the correct identification numbers for the printing presses.

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

## A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 32-inch Web-fed UV lithographic printing press, identified as Press 1, constructed in 1988 **and approved for modification with the addition of a coater unit in 2009**, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV1a. ~~The press uses only UV inks and no coatings.~~ The press is equipped with one (1) natural gas-fired dryer with a maximum heat input capacity of 1.50 MMBtu/hr.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) 32-inch Web-fed UV lithographic printing press, identified as Press 1, constructed in 1988 **and approved for modification with the addition of a coater unit in 2009**, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV1a. ~~The press uses only UV inks and no coatings.~~ The press is equipped with one (1) natural gas-fired dryer with a maximum heat input capacity of 1.50 MMBtu/hr.

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, Press 1, 2, 3, and 4 shall not cause, allow, or permit the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

IDEM, OAQ has decided to make additional revisions to the permit as described below. The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

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

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](http://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 Summer Keown, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,



Alfred C. Dumaul, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit and calculations

ACD/SJK

cc: File - LaPorte County  
LaPorte County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Graphic Packaging International, Inc.  
115 Koomler Drive  
LaPorte, Indiana 46350**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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 2-6.1, 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.: M091-24283-00099	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 29, 2007  Expiration Date: August 29, 2012
First Notice-Only Change No. 091-26265-00099      Issued March 31, 2008	
Second Notice-Only Change No. 091-26869-00099      Issued August 25, 2008	
Third Notice-Only Change No. 091-27970-00099	
Issued by:  Alfred C. Dumauval, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 11, 2009  Expiration Date: August 29, 2012

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
<b>B. GENERAL CONDITIONS .....</b>	<b>6</b>
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability	
B.7 Severability	
B.8 Property Rights or Exclusive Privilege	
B.9 Duty to Provide Information	
B.10 Certification	
B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.12 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.15 Permit Renewal [326 IAC 2-6.1-7]	
B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.17 Source Modification Requirement	
B.18 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]	
B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.20 Annual Fee Payment [326 IAC 2-1.1-7]	
B.21 Credible Evidence [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>12</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	

**Corrective Actions and Response Steps**

- C.13 Response to Excursions or Exceedances
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 18**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 20**

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.2.2 Particulate Control
- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

- D.2.4 Cyclone Failure Detection

**D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 21**

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

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

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

- D.3.2 Record Keeping Requirement

Certification Form..... 23  
Annual Notification ..... 24  
Malfunction Report ..... 25  
Affidavit of Construction ..... 27

## 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)]

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The Permittee owns and operates a stationary food industry printed packaging production process.

Source Address:	115 Koomler Drive, LaPorte, Indiana 46350
Mailing Address:	835 A-1 Franklin Court, Marietta, GA 30067
General Source Phone Number:	(219) 324-6160
SIC Code:	2631
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 32-inch Web-fed UV lithographic printing press, identified as Press 1, constructed in 1988 and approved for modification with the addition of a coater unit in 2009, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV1a. The press is equipped with one (1) natural gas-fired dryer with a maximum heat input capacity of 1.50 MMBtu/hr.
- (b) One (1) 40-inch Web-fed offset lithographic printing press, identified as Press 2, constructed in 1992, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV2a and SV2b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-3, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (c) One (1) 32-inch Web-fed offset lithographic printing press, identified as Press 3, constructed in 1998, with a maximum capacity of 700 feet per minute using no control equipment and exhausting to stack SV3a and SV3b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-4, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (d) Two (2) water-based adhesive gluers, identified as gluer #1 and #2, each with a maximum capacity of 5.11 pounds per hour of glue. Gluer #1 installed in 1993 Gluer #2 installed in 1998. All adhesives are applied by rollers or extrusion.
- (e) Two (2) natural gas-fired make up air units, identified as FCU-1, with a combined maximum heat input capacity of 5.8 MMBtu/hr. The make up air units were constructed in 1993.

- (f) Eleven (11) natural gas-fired space heaters, identified as FCU-2, with a maximum combined heat input capacity of 2.2 MMBtu/hr. The space heaters were constructed in 1999.
- (g) One (1) plate room with a maximum production rate of 3.7 pounds of printing plates per hour. The plate room was constructed in 1989.
- (h) One (1) shrink wrap machine including one (1) natural gas-fired burner with a maximum heat input capacity of 1.47 MMBtu/hr. The shrink wrap machine was constructed in 2006.
- (i) One (1) degreasing operation that does not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6. The degreasing operation was constructed in 2001.
- (j) One (1) paper baling operation, identified as 203-101, with a maximum production rate of 1.6 tons per hour. The paper baling operation collection system includes a pneumatic collection system, three (3) louver-type baffle air/scrap separation units (one on each baler) and one (1) cyclone to collect the scrap materials exhausting from balers #2 and #3 through stacks SBV1 and SBV2. The cyclones are integral to the collection system. The baling operation was constructed in 1988.
- (k) One (1) 33.5-inch Web-fed UV light lithographic printing press, identified as Press 4, with a maximum capacity of 1,300 feet per minute using no control equipment and exhausting to stack SV4a through SV4c. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) electric dryer and is approved for construction in 2007.
- (l) Two (2) water-based adhesive gluers, identified as gluer #3 and #4, each with a maximum capacity of 5.11 pounds per hour of glue, approved for construction in 2007. All adhesives are applied by rollers or extrusion.

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M091-24283-00099, 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, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.6 Enforceability**

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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- (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.10 Certification**

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

**B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 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.12 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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- (a) All terms and conditions of permits established prior to M091-24283-00099 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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

B.15 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  
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 ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.16 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

B.17 Source Modification Requirement

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

**B.18 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.19 Transfer of Ownership or Operational Control** [326 IAC 2-6.1-6]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement 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.20 Annual Fee Payment** [326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.21 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Corrective Actions and Response Steps**

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

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

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

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

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

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

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

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

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

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

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (i) One (1) degreasing operation that does not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6. The degreasing operation was constructed in 2001.

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

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

#### D.1.1 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.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (j) One (1) paper baling operation, identified as 203-101, with a maximum production rate of 1.6 tons per hour. The paper baling operation collection system includes a pneumatic collection system, three (3) louver-type baffle air/scrap separation units (one on each baler) and one (1) cyclone to collect the scrap materials exhausting from balers #2 and #3 through stacks SBV1 and SBV2. The cyclones are integral to the collection system. The baling operation was constructed in 1988.

(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the particulate emissions from the Paper Baling Operation shall not exceed 5.59 pounds per hour when operating at a process weight rate of 1.6 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

### Compliance Determination Requirements

#### D.2.2 Particulate Control

In order to comply with D.2.1, the cyclones for particulate control shall be in operation and control emissions from the paper baling operation at all times that the pneumatic collection system is in operation.

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall perform PM and PM-10 testing for the paper baling operation collection system utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

#### D.2.4 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. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) 32-inch Web-fed UV lithographic printing press, identified as Press 1, constructed in 1988 and approved for modification with the addition of a coater unit in 2009, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV1a. The press is equipped with one (1) natural gas-fired dryer with a maximum heat input capacity of 1.50 MMBtu/hr.
- (b) One (1) 40-inch Web-fed offset lithographic printing press, identified as Press 2, constructed in 1992, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV2a and SV2b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-3, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (c) One (1) 32-inch Web-fed offset lithographic printing press, identified as Press 3, constructed in 1998, with a maximum capacity of 700 feet per minute using no control equipment and exhausting to stack SV3a and SV3b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-4, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (d) Two (2) water-based adhesive gluers, identified as gluer #1 and #2, each with a maximum capacity of 5.11 pounds per hour of glue. Gluer #1 installed in 1993 Gluer #2 installed in 1998. All adhesives are applied by rollers or extrusion.
- (k) One (1) 33.5-inch Web-fed UV light lithographic printing press, identified as Press 4, with a maximum capacity of 1,300 feet per minute using no control equipment and exhausting to stack SV4a through SV4c. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) electric dryer and is approved for construction in 2007.
- (l) Two (2) water-based adhesive gluers, identified as gluer #3 and #4, each with a maximum capacity of 5.11 pounds per hour of glue, approved for construction in 2007. All adhesives are applied by rollers or extrusion.

(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 2-7-5(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, Press 1, 2, 3, and 4 shall not cause, allow, or permit the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

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

#### D.3.2 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Graphic Packaging International, Inc.  
Source Address: 115 Koomler Drive, LaPorte, Indiana 46350  
Mailing Address: 835 A-1 Franklin Court, Marietta, GA 30067  
MSOP No.: 091-24283-00099

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Graphic Packaging International, Inc.
<b>Address:</b>	115 Koomler Drive
<b>City:</b>	LaPorte, Indiana 46350
<b>Phone #:</b>	(219) 324-6160
<b>MSOP #:</b>	M091-24283-00099

I hereby certify that Graphic Packaging International, Inc.  still in operation.  
is :

I hereby certify that Graphic Packaging International, Inc.  no longer in operation.  
is :  in compliance with the requirements of MSOP M091-24283-00099.  
 not in compliance with the requirements of MSOP M091-24283-00099.

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

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

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

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

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

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

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

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

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

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

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

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Graphic Packaging International, Inc.  
115 Kloomer Drive  
LaPorte, Indiana 46350

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)

3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)

4. I hereby certify that Graphic Packaging International, Inc. 115 Kloomer Drive, LaPorte, Indiana 46350, completed construction of new emission units at the food industry printed packaging production plant on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on \_\_\_\_\_ and as permitted pursuant to New Source Review Permit and Minor Source Operating Permit No. M091-24283-00099, Plant ID No. 091-00099, issued on: \_\_\_\_\_.

5. **Note to the Permittee: Strikethrough this paragraph if it does not apply.** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_

\_\_\_\_\_  
Name (typed or printed)

**Attachment A: Emissions Summary  
Printing Presses 1, 2, 3 and 4: VOC**

**Company Name:** Graphic Packaging International, Inc.  
**Address City IN Zip:** 115 Kloomer Drive, LaPorte, Indiana 46350  
**Permit Number:** 091-27970-00099  
**Reviewer:** Summer Keown  
**Date:** May 28, 2009

<b>Emissions Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Total HAPs</b>
Printing Presses (1, 2, 3 and 4)	--	--	--	--	--	64.8	--	negl.
Gluers (1, 2, 3 and 4)	--	--	--	--	--	8.95	--	0.11
Baling Operations	16.2	16.2	16.2	--	--	--	--	--
Plate Room	--	--	--	--	--	0.15	--	0.01
Natural Gas Combustion	0.11	0.46	0.46	0.04	6.00	0.33	5.04	0.11
<b>Total</b>	<b>16.31</b>	<b>16.66</b>	<b>16.66</b>	<b>0.04</b>	<b>6.00</b>	<b>74.23</b>	<b>5.04</b>	<b>0.23</b>

**Attachment A: Emissions Summary**  
**Printing Presses 1, 2, 3 and 4: VOC**

**Company Name:** Graphic Packaging International, Inc.  
**Address City IN Zip:** 115 Kloomer Drive, LaPorte, Indiana 46350  
**Permit Number:** 091-27970-00099  
**Reviewer:** Summer Keown  
**Date:** May 28, 2009

	Max Machine Speed (ft/min)	Max. Sheet Width (inches)	Operating Schedule (hrs/yr)*	Type of Material Applied or Used	Max Sheet Coverage**	Area Printed/Coated (ft2/hr)	Material Usage Factors	Material Usage Factor Units	Maximum Usage (lb/hr)	Maximum Usage (lb/yr)	Max VOC Content (wt %)	PTE VOC (lb/hr)	PTE VOC (tons/yr)	Total PTE (lb/hr)	Total PTE (lb/day)	Total VOC (tons/yr)	Constructed
Press 4	1300	33.4	7884	UV Ink	120%	260,520	0.00024	lb/ft2 printed	75.0	591,535	0.01%	0.01	0.03	5.8	139.9	23.0	2007
				Coating	100%	217,100	0.00031	lb/ft2 coated	67.3	530,601	2.40%	1.62	6.37				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	8.88	69,998	30%	2.66	10.50				
				UV Wash Solution	na	na	0.022	lbs/lb ink used	1.62	12,805	95%	1.54	6.08				
Press 1	800	32	7884	UV Ink	120%	153,600	0.00024	lb/ft2 printed	36.34	286,527	0.01%	0.00	0.01	3.4	81.6	13.4	1988
				Coating <sup>1</sup>	100%	128,000	0.00031	lb/ft2 coated	39.09	308,152	2.40%	0.94	3.70				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	5.15	40,601	30%	1.54	6.09				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	0.96	7,569	95%	0.91	3.60				
Press 2	800	40	7884	UV Ink	120%	192,000	0.00024	lb/ft2 printed	45.43	429,790	0.01%	0.00	0.02	4.2	101.7	16.7	1992
				Coating	100%	160,000	0.00030	lb/ft2 coated	48.40	381,586	2.40%	1.16	4.58				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	6.44	50,751	30%	1.93	7.61				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	1.20	9,461	95%	1.14	4.49				
Press 3	700	32	7884	UV Ink	120%	134,400	0.00024	lb/ft2 printed	31.80	300,853	0.01%	0.00	0.01	3.0	71.4	11.7	1998
				Coating	100%	112,000	0.00031	lb/ft2 coated	34.20	269,633	2.40%	0.82	3.24				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	4.51	35,526	30%	1.35	5.33				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	0.84	6,623	95%	0.80	3.15				
<b>Total:</b>															<b>64.8</b>		

<sup>1</sup> Coating unit to be added

\* Maximum operating schedule provides for 10% press downtime to allow for wash ups and set ups during production run change overs between jobs

\*\* Maximum print area coverage is 100% on top side plus 20% on back side

\*\*\* Material usage factors derived from actual material usage per square foot

**Methodology**

Maximum Usage (lb/hr) = area printed/coated (ft2/hr) x max sheet coverage x material usage factors

Maximum Usage (lb/yr) = maximum usage (lb/hr) x operating schedule (hrs/yr)

PTE VOC (lbs/hr) = maximum usage (lb/yr) x max VOC content (wt%) x 1 yr/8760 hrs.

PTE VOC (tons/yr) = maximum usage (lb/yr) x max VOC content (wt%) x 1 ton/2000 lbs.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Patrick Combs  
Graphic Packaging International, Inc.  
115 Koomler Drive  
LaPorte, Indiana 46350

**DATE:** June 11, 2009

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

**SUBJECT:** Final Decision  
MSOP  
091-27970-00099

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:  
John Reavuori (Graphic Packaging International, Inc.)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 6/11/2009 Graphic Packaging International, Inc. 091-27970-00099 (final)		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Patrick Combs Graphic Packaging International, Inc. 115 Koomler Dr LaPorte IN 46350 (Source CAATS) <b>VIA CONFIRMED DELIVERY</b>										
2		John Raevuori Graphic Packaging International, Inc. 835 A-1 Franklin Ct Marietta GA 30067 (RO CAATS)										
3		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
4		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)										
5		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
6		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)										
7		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 (Affected Party)										
8		Ms. Mindy Heidel 9223 Broadway Suite A Merrillville IN 46410 (Affected Party)										
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
<b>7</b>			