



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 29, 2010

RE: Zimmer Custom - Made Packaging, Inc / 097-28767-00029

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Zimmer Custom-Made Packaging, Inc.
1450 East 20th Street
Indianapolis, Indiana 46218

(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.: M097-28767-00029	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 29, 2010 Expiration Date: April 29, 2020

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
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. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12 Permit Renewal [326 IAC 2-6.1-7]	
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14 Source Modification Requirement	
B.15 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17 Annual Fee Payment [326 IAC 2-1.1-7]	
B.18 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
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]	
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]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 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 - Presses..... 17

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]
- D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.3 Volatile Organic Compounds (VOC)

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

- D.1.4 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS - Boilers 19

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

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

D.3. EMISSIONS UNIT OPERATION CONDITIONS - Degreasers 20

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

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

E.1. EMISSIONS UNIT OPERATION CONDITIONS - NSPS 22

- E.1.1 New Source Performance Standard for Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RR]

Annual Notification 23

Malfunction Report 24

Attachment A: New Source Performance Standard for Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

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 printing source.

Source Address:	1450 East 20th Street, Indianapolis, Indiana 46218
Mailing Address:	1450 E. 20th Street, Indianapolis, IN 46218
General Source Phone Number:	(317) 263-3436
SIC Code:	2671
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One flexographic press, identified as Unit ID #12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (b) One flexographic press, identified as Unit ID #14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (c) One flexographic press, identified as Unit ID #15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (d) One flexographic press, identified as Unit ID #16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].
- (e) One CentralFlex Printing press, identified as Unit ID #17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (f) One flexographic press, identified as Unit ID #18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].
- (g) One flexographic press, identified as Unit ID #20, constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].
- (h) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (i) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.
- (j) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

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, M097-28767-00029, 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. 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 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 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M097-28767-00029 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.11 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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 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 an affirmation that the statements in the application are true and complete 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 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 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.16 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
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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (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.18 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

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

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

- (a) For performance testing required by this permit, 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 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.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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One flexographic press, identified as Unit ID #12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (b) One flexographic press, identified as Unit ID #14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (c) One flexographic press, identified as Unit ID #15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (d) One flexographic press, identified as Unit ID #16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (e) One CentralFlex Printing press, identified as Unit ID #17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (f) One flexographic press, identified as Unit ID #18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (g) One flexographic press, identified as Unit ID #20, constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

(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 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(c)(1) (Graphic Arts Operations), the volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water for flexographic presses #16, #17, #18, and #20.

- (b) Pursuant to 326 IAC 8-5-5(f), work practices shall be used to minimize VOC emissions from cleaning operations associated with flexographic presses #16, #17, #18, and #20. Work practices shall include, but not be limited to, the following:
 - (1) When not in use, all cleaning materials shall be kept in closed containers.
 - (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

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

A Preventive Maintenance Plan is required for flexographic printing presses #12, #14, #15, #16, #17, #18, and #20. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the VOC content, as applied, and the water content, as applied, of each ink used.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (i) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.

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

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

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

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Source of Indirect Heating), the particulate emissions from Boiler 1 and Boiler 2 shall each not exceed 0.52 pounds per million British thermal unit of heat input.

This limit was calculated by the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

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

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

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), 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.3.2 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 requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following 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 E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One flexographic press, identified as Unit ID #16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (e) One CentralFlex Printing press, identified as Unit ID #17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (f) One flexographic press, identified as Unit ID #18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (g) One flexographic press, identified as Unit ID #20, constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

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

E.1.1 New Source Performance Standard for Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RR]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart RR (included as Attachment A of this permit) for presses #16, #17, #18 and #20:

- (1) 40 CFR 60.440(b)
- (2) 40 CFR 60.441
- (3) 40 CFR 60.445(d) and (h)

**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).

Company Name:	Zimmer Custom-Made Packaging, Inc.
Address:	1450 East 20th Street
City:	Indianapolis, Indiana 46218
Phone #:	(317) 263-3436
MSOP #:	M097-28767-00029

I hereby certify that Zimmer Custom-Made Packaging, Inc. still in operation.

:

no longer in operation.

I hereby certify that Zimmer Custom-Made Packaging, Inc. in compliance with the requirements of MSOP M097-28767-00029.

:

not in compliance with the requirements of MSOP M097-28767-00029.

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
COMPLIANCE AND ENFORCEMENT BRANCH
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:

Attachment A: Applicable NSPS requirements

Title 40: Protection of Environment

[PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES](#)

Subpart RR—Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Source: 48 FR 48375, Oct. 18, 1983, unless otherwise noted.

§ 60.440 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.

(b) Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.

(c) This subpart applies to any affected facility which begins construction, modification, or reconstruction after December 30, 1980.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.441 Definitions and symbols.

(a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

Coating applicator means an apparatus used to apply a surface coating to a continuous web.

Coating line means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

Coating solids applied means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

Flashoff area means the portion of a coating line after the coating applicator and usually before the oven entrance.

Fugitive volatile organic compounds means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

Hood or enclosure means any device used to capture fugitive volatile organic compounds.

Oven means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

Precoat means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

Solvent applied in the coating means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

Total enclosure means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

(b) All symbols used in this subpart not defined below are given meaning in the Act or in subpart A of this part.

a =the gas stream vents exiting the emission control device.

b =the gas stream vents entering the emission control device.

C_{aj} =the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.

C_{bi} =the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.

C_{fk} =the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.

G =the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.

M_{ci} =the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

M_r =the total mass (kg) of solvent recovered for a calendar month.

Q_{aj} =the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

Q_{bi} =the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

Q_{fk} =the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

R =the overall VOC emission reduction achieved for a calendar month (in percent).

R_q =the required overall VOC emission reduction (in percent).

W_{oi} =the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

W_{si} =the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.442 Standard for volatile organic compounds.

(a) On and after the date on which the performance test required by §60.8 has been completed each owner or operator subject to this subpart shall:

(1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

(2) Demonstrate for each affected facility;

(i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or

(ii) The percent overall VOC emission reduction specified in §60.443(b) as calculated over a calendar month.

§ 60.443 Compliance provisions.

(a) To determine compliance with §60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^n W_{oi} M_{ci}}{\sum_{i=1}^n W_{si} M_{ci}}$$

(3) For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with §60.442(a)(1).

(b) To determine compliance with §60.442(a)(2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q . If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

(c) Where compliance with the emission limits specified in §60.442(a)(2) is achieved through the use of a solvent recovery system, the owner or operator shall determine the overall VOC emission reduction for a one calendar month period by the following equation:

$$R = \sum_{i=1}^n \frac{M_r}{W_{oi} M_{ci}} \times 100$$

If the R value is equal to or greater than the R_q value specified in paragraph (b) of this section, then compliance with §60.442(a)(2) is demonstrated.

(d) Where compliance with the emission limit specified in §60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph (b) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with §60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with §60.442(a)(2).

(e) Where compliance with §60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2). For catalytic incineration destruction devices, the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device immediately before the catalyst bed is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2), and all 3-hour periods (during actual coating operations) during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test complying with §60.442(a)(2).

(f) After the initial performance test required for all affected facilities under §60.8, compliance with the VOC emission limitation and percentage reduction requirements under §60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

(g) If a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with §60.442(a)(2) is determined by the methods specified in paragraphs (c) and (d) of this section and is performed simultaneously on all affected facilities.

(h) If a common emission control device is used to recover solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator of the existing facility (or facilities) shall determine the mass of solvent recovered for a calendar month period from the existing facility (or facilities) prior to the connection of the affected facility (or facilities) to the emission control device.

(2) The affected facility (or facilities) shall then be connected to the emission control device.

(3) The owner or operator shall determine the total mass of solvent recovered from both the existing and affected facilities over a calendar month period. The mass of solvent determined in paragraph (h)(1) of this section from the existing facility shall be subtracted from the total mass of recovered solvent to obtain the mass of solvent recovered from the affected facility (or facilities). The overall VOC emission reduction of the affected facility (or facilities) can then be determined as specified in paragraph (c) of this section.

(i) If a common emission control device(s) is used to destruct solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator shall operate the emission control device with both the existing and affected facilities connected.

(2) The concentration of VOC (in parts per million by volume) after the common emission control device shall be determined as specified in §60.444(c). This concentration is used in the calculation of compliance for both the existing and affected facilities.

(3) The volumetric flow out of the common control device attributable to the affected facility (or facilities) shall be calculated by first determining the ratio of the volumetric flow entering the common control device attributable to the affected facility (facilities) to the total volumetric flow entering the common control device from both existing and affected facilities. The multiplication of this ratio by the total volumetric flow out of the common control device yields the flow attributable to the affected facility (facilities). Compliance is determined by the use of the equation specified in §60.444(c).

(j) Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at §60.442(a)(2) is being attained.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.444 Performance test procedures.

(a) The performance test for affected facilities complying with §60.442 without the use of add-on controls shall be identical to the procedures specified in §60.443(a).

(b) The performance test for affected facilities controlled by a solvent recovery device shall be conducted as follows:

(1) The performance test shall be a one calendar month test and not the average of three runs as specified in §60.8(f).

(2) The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in §60.443(a) (1) and (2).

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Inventory VOC usage and VOC recovery for a one calendar month period.

(5) Determine the percent overall VOC emission reduction as specified in §60.443(c).

(c) The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

(1) The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in §60.8(f).

(2) Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in §60.443(a). In this application the quantities of W_{oi} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in §60.441.

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$R = \frac{\sum_{i=1}^n Q_i C_i - \sum_{j=1}^n Q_j C_j}{\sum_{i=1}^n Q_i C_i + \sum_{k=1}^p Q_k C_k} \times 100$$

(i) The owner or operator of the affected facility shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.446(b).

(ii) The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

(iii) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in §60.443(b), compliance with §60.442(a)(2) is demonstrated.

§ 60.445 Monitoring of operations and recordkeeping.

(a) The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

(b) The owner or operator of an affected facility controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected facility.

(c) The owner or operator of an affected facility controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ± 2.0 percent. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the device.

(d) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

(e) The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5 °C.

(f) The owner or operator of an affected facility controlled by a catalytic incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed.

(g) The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.

(h) Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements.

§ 60.446 Test methods and procedures.

(a) The VOC content per unit of coating solids applied and compliance with §60.422(a)(1) shall be determined by either Method 24 and the equations specified in §60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter

sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

(b) Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(c) If the owner or operator can demonstrate to the Administrator's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Administrator will approve testing of representative stacks on a case-by-case basis.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.447 Reporting requirements.

(a) For all affected facilities subject to compliance with §60.442, the performance test data and results from the performance test shall be submitted to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A).

(b) Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(c) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.443(e). If no such periods occur, the owner or operator shall state this in the report.

(d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[48 FR 48375, Oct. 18, 1983, as amended at 55 FR 51383, Dec. 13, 1990]

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

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

Source Background and Description

Source Name:	Zimmer Custom-Made Packaging
Source Location:	1450 East 20th Street, Indianapolis, IN 46218
County:	Marion
SIC Code:	2671
Operation Permit No.:	M097-28767-00029
Permit Reviewer:	Summer Keown

On March 23, 2010, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Zimmer Custom-Made Packaging had applied for a Minor Source Operating Permit (MSOP) Renewal to continue to operate a stationary printing source. The notice also stated that the OAQ proposed to issue a MSOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On March 31, 2010, Zimmer Custom-Made Packaging submitted comments to IDEM, OAQ on the draft MSOP Renewal.

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

Comment 1:

Zimmer Custom-Made Packaging requests the removal of the requirement to have a Preventative Maintenance Plan for the flexographic printing press. This was not a requirement in our previous permits. There is not a clear connection between how preventative maintenance on the press would impact actual emissions of regulated pollutants.

Response to Comment 1:

Pursuant to 326 IAC 1-6-1 (Applicability), 326 IAC 1-6-3 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. The source is subject to 326 IAC 6.1 because the potential to emit of each criteria air pollutant is less than 100 tons per twelve (12) consecutive month period. Therefore, it is clear from the structure of 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. In additional support of this position, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in "any control device or combustion or process equipment". Lack of proper maintenance could cause or contribute to increased emissions at the printing presses by increased ink, solvent, or fountain solution usage attributed to but not limited to the following: spillage, excessive ink application, or excessive evaporation.

Therefore, no changes were made as a result of this comment.

Comment 2:

Condition D.1.3 states "Compliance with the VOC content and usage limitations contained in Condition D.1.1..." Condition D.1.1 does not contain a usage limitation for VOC. Therefore, we request that this condition be revised to state the following: "Compliance with the VOC content requirements contained in Condition D.1.1..."

Response to Comment 2:

IDEM agrees with the recommended changes, since the compliance requirement is for VOC content and not usage. The permit has been revised as follows:

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(c) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Comment 3:

Condition D.1.4(a) indicates that Zimmer should maintain monthly records of the VOC content of each coating material and solvent used less water. The requirement in D.1.1 requires a VOC content of 25% by volume or less and a water content of 75% by volume. We do not feel that VOC content less water is an appropriate way to demonstrate compliance with D.1.1. We propose the following language:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a list of inks used each month with the following information for each ink: VOC content by volume and water content by volume.

Response to Comment 3:

IDEM, OAQ agrees that the VOC content less water is not required to be recorded. The permit has been revised as follows:

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the VOC content, **as applied, and the water content, as applied, of each ink used.** ~~of each coating material and solvent used less water.~~
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

Comment 4:

Because the inks used at Zimmer Custom-Made Packaging do not change very often, we feel that a monthly record is not necessary. We suggest that records of inks used should be maintained for the five year period identified in Section C - General Record Keeping Requirements.

Response to Comment 4:

Because compliance is determined on a monthly basis, the permit requires monthly record keeping. No changes were made as a result of this comment.

Additional Changes

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

1. IDEM, OAQ has decided to clarify Section B - Preventative Maintenance Plan to be consistent with the rule.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

The Permittee shall implement the PMPs.

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

- (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.
 - (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.
2. A typographical error was corrected in Condition D.1.3. to reference 326 IAC 8-1-4(a)(3).

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)~~(e)~~**(3)** and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

IDEM Contact

- (a) Questions regarding this proposed MSOP Renewal can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Zimmer Custom-Made Packaging
Source Location:	1450 East 20th Street, Indianapolis, IN 46218
County:	Marion
SIC Code:	2671
Permit Renewal No.:	M097-28767-00029
Permit Reviewer:	Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Zimmer Custom-Made Packaging relating to the operation of a stationary printing source.

History

On December 18, 2009, Zimmer Custom-Made Packaging submitted an application to the OAQ requesting to renew its operating permit. Zimmer Custom-Made Packaging was issued MSOP No. M097-15253-00029 on September 22, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One flexographic press, identified as Unit ID #12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (b) One flexographic press, identified as Unit ID #14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (c) One flexographic press, identified as Unit ID #15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (d) One flexographic press, identified as Unit ID #16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].
- (e) One CentralFlex Printing press, identified as Unit ID #17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].
- (f) One flexographic press, identified as Unit ID #18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (g) One flexographic press, identified as Unit ID #20, constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

Under 40 CFR 60, Subpart RR, this unit is considered an affected facility [40 CFR 60, Subpart RR] and [326 IAC 12].

- (h) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (i) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.
- (j) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

Emission Units and Pollution Control Equipment Removed From the Source

- (a) One flexographic press, identified as Unit ID #10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5, was removed in 2008.
- (b) One flexographic press, identified as Unit ID #19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17, was removed prior to 2008.
- (c) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1, was removed in 2008.

Existing Approvals

Since the issuance of the MSOP No. M097-15253-00029 on September 22, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Notice-Only Change No. 097-20142-00029 issued on June 6, 2005; and
- (b) Notice-Only Change No. 097-23598-00029 issued on September 7, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this MSOP Renewal:

- (a) All permit conditions relating to the Faustel Line.

Reason not incorporated: The Faustel Line was removed from the source in 2009.

- (b) All permit conditions relating to flexographic presses #10 and #19.

Reason not incorporated: Flexographic presses #10 and #19 were removed from the source in 2009.

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**:

1. 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". In addition, all occurrences of IDEM mailing addresses have been revised to include a mail code (MC). 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

2. Local agencies no longer have effective authority to implement state and federal requirements for IDEM. Therefore, IDEM has removed all references to local agencies from the permit.

B.86 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~
- ~~(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and 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
Indianapolis, IN 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46224~~

- (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)(d) 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, ~~and OES~~ on or before the date it is due.

B.97 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) **no later than within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later**, including the following information on each emissions ~~unit~~ **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

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46224~~

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

- ~~(b)~~ The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- ~~(b)(c)~~ A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(c)(e)~~ To the extent the Permittee is required by 40 CFR 60/63 to have an Operation, Maintenance and Monitoring Plan (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.138 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 Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (c) The Permittee shall notify the OAQ **no later than** within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- ~~(d)~~ ~~No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

B.915 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, OES, U.S. EPA, or an authorized representative to perform the following:

...

B.4016 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

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

- (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 an affirmation that the statements in the application are true and complete 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.4417 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to ~~OES~~ **no later than** within thirty (30) calendar days of receipt of a **bill from IDEM, OAQ, 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)** ~~317-327-2234 (ask for OES Air Compliance)~~, to determine the appropriate permit fee.

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

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

...

- (e) For any cause which establishes in the judgment of IDEM ~~and OES~~, the fact that continuance of this permit is not consistent with purposes of this article.

C.75 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

- (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 ~~Asbestos Section~~, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

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 2-7-1(34).~~

C.68 Performance Testing [326 IAC 3-6]

- ~~(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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

~~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).~~

- (a) For performance testing required by this permit, 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ ~~and OES~~ not later than forty-five (45) days after the completion of the testing. An extension may be granted by ~~the~~ IDEM, OAQ, ~~and OES~~ 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.

C.1542- 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 ~~or OES~~ makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner ~~or OES~~ within a reasonable time.

...

C.1643 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** ~~Data Section~~, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

- (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, ~~and OES~~ on or before the date it is due.

...

- 3. IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all timelines have been switched to "no later than" or "not later than" except for when the underlying rule states "within".

B.97 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**
- (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.**

~~(a)~~ **(b)** If required by specific condition(s) in Section D of this permit **where no PMP was previously required**, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) **no later than within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later**, including the following information on each emissions unit 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

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

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

- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, ~~and OES~~ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, ~~and OES~~. IDEM, OAQ, ~~and OES~~ may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any

~~limitation on emissions or potential to emit. The PMP does not require the certification by an authorized individual as defined by 326 IAC 2-1.1-1(1).~~

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

B.138 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 ~~Permits Branch~~, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46224~~

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

- (c) The Permittee shall notify the OAQ **no later than** ~~within~~ thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) ~~No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

B.1610 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

~~Pursuant to [326 IAC 2-6.1-6(d)(3)]:~~

- (a) ~~In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.~~
- (b) ~~The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).~~
- (c) ~~IDEM, OAQ, and OES shall issue a revised permit.~~

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

- (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 an affirmation that the statements in the application are true and complete 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.1744 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES due no later than within thirty (30) calendar days of receipt of a billing from IDEM, OAQ.
- (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)** 317-327-2234 (ask for OES Air Compliance), to determine the appropriate permit fee.

C.86 Performance Testing [326 IAC 3-6]

- ~~(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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46224~~

~~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).~~

- (a) For performance testing required by this permit, 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES 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.

C.1340 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 **submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.** ~~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 emissions unit while the response actions are being implemented.~~
- (b) A retest to demonstrate compliance shall be performed **no later than within one hundred eighty (180) twenty (120) days after the date of the test.** ~~of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred eighty (180) and 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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

C.1643 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** ~~Data Section~~, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46224

- (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, and OES 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. The reports do not 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.~~
 - (c) 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.**
4. IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.

B.97 Preventive Maintenance Plan [326 IAC 1-6-3]

...

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. ~~The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

B.1640 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

C.86 Performance Testing [326 IAC 3-6]

- ~~(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 Data Section, Office of Air Quality
400 North Senate Avenue

~~Indianapolis, Indiana 46204-2251~~

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

~~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).~~

- (a) **For performance testing required by this permit, 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.

...

C.75 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

- (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 ~~Asbestos Section~~, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

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 2-7-1(34).~~

C.1340 Actions Related to Noncompliance Demonstrated by a Stack Test

...

- (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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

~~C.1643~~ General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

...

- ~~(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. The reports do not 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.~~

- (c) 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.**

5. IDEM has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventative maintenance plans developed. IDEM has decided to clarify other aspects of Section B - Preventative Maintenance Plan.

~~B.97~~ Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

- (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.**

- ~~(a)~~ **(b)** If required by specific condition(s) in Section D of this permit **where no PMP was previously required**, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) **no later than within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later**, including the following information on each emissions ~~unit~~ **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

and

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

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

- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, ~~and OES~~ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, ~~and OES~~. IDEM, OAQ, ~~and OES~~ may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. ~~The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (d) To the extent the Permittee is required by 40 CFR 60/63 to have an Operation, Maintenance and Monitoring Plan (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
6. IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

~~B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]~~

~~This permit 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 of this permit do not affect the expiration date.~~

~~The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

B.12 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 an affirmation that the statements in the application are true and complete 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 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

7. IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.3 Opacity [326 IAC 5-1]

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

...

8. IDEM has added Section C - Incineration to reflect the two underlying incineration rules concerning incineration.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

9. IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

C.86 Performance Testing [326 IAC 3-6]

~~(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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~

~~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).~~

- (a) For performance testing required by this permit, 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.

...

10. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

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

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

11. IDEM has added Section C - Response to Excursions or Exceedances. It is only when an excursion or exceedance is detected that the requirements of this condition need to be followed.

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:**
- (1) initial inspection and evaluation;**

- (2) **recording that operations returned or are returning 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 normal or usual manner of operation.**
 - (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 record the reasonable response steps taken.**
- 12. IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirement to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeline.

C.1340 ~~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 **submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.** ~~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 emissions unit while the response actions are being implemented.~~
- (b) A retest to demonstrate compliance shall be performed **no later than within one hundred eighty (180) twenty (20) days after the date of the test.** ~~of receipt of the original test results.~~ Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred **eighty (180) and twenty (20) 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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

13. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

C.1542-General Record Keeping Requirements [326 IAC 2-6.1-5]

- (b) Unless otherwise specified in this permit, **for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.** ~~shall be implemented when operation begins.~~

Enforcement Issue

IDEM is aware that the existing equipment has been operated prior to receipt of the proper permit. The MSOP expired on September 22, 2008. The MSOP renewal was not requested until December 18, 2009. No additional emission units have been constructed.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the permit requirements.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

- (a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)								Total HAPs
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	SingleHAP	
Printing Presses	negl.	negl.	negl.	0.00	38.22	0.00	0.00	0.00	0.00
Natural Gas-Fired Boilers	0.20	0.78	0.78	0.06	0.57	8.65	10.29	0.19 (hexane)	0.19
Degreasers	0.00	0.00	0.00	0.00	5.00	0.00	0.00	0.00	0.00
Total Emissions	0.20	0.78	0.78	0.06	43.78	8.65	10.29	0.19 (hexane)	0.19

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5}, are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Flexographic presses #16, #17, #18, and #20 are subject to the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60, Subpart RR), which is incorporated by reference as 326 IAC 12. These presses are subject because they were constructed after December 30, 1980 and each press has a potential VOC input of less than 50 tons (45 Mg) per twelve consecutive month period. Flexographic presses #12, #14 and #15 are not subject to this NSPS because they were constructed prior to 1980.

 Nonapplicable portions of the NSPS will not be included in the permit. Flexographic presses #16, #17, #18, and #20 are subject to the following portions of Subpart RR:
 - (1) 40 CFR 60.440(b)
 - (2) 40 CFR 60.441
 - (3) 40 CFR 60.445(d) and (h)
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR, are not included in the permit for flexographic presses #12, #14, and #15. Construction of these units commenced prior to December 30, 1980.

- (c) The requirements of the New Source Performance Standard for Publication Rotogravure Printing, 40 CFR 60, Subpart QQ, are not included in the permit for the flexographic printing presses because the presses are not rotogravure printing units as defined in 40 CFR 60.431.
- (d) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for the natural gas-fired boilers, identified as Boiler 1 and Boiler 2, because the boilers were constructed prior to June 9, 1989.
- (e) There are no additional New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, Subpart KK are not included in the permit for the flexographic printing presses. These facilities are not located at a major source of HAPs.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

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

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

Pursuant to 326 IAC 6-5-1, this rule is applicable to any source of fugitive particulate matter emissions located in nonattainment areas for particulate matter which has potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. This source is not located in a nonattainment county for PM, nor does it have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, this rule is not applicable to the source.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5, a source located in Marion County with actual emissions of ten (10) tons or more of particulate matter per year is subject to this rule. This source has potential particulate matter emissions of less than ten (10) tons per year. Therefore, the source is not subject to this rule.

State Rule Applicability – Printing Presses

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

The flexographic printing presses are not subject to the conditions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because potential particulate emissions from the printing presses are less than 0.551 pound per hour.

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

Pursuant to 326 IAC 8-1-6, facilities constructed after January 1, 1980 that have potential VOC emissions of twenty-five (25) tons or more per year are subject to this rule. The potential VOC emissions for each of the printing presses is less than twenty-five (25) tons per year. Therefore, the printing presses are not subject to this rule.

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

Pursuant to 326 IAC 8-5-5(a)(2), the conditions of 326 IAC 8-5-5 are applicable to packaging rotogravure, publication rotogravure and flexographic printing sources constructed after November 1, 1980, located anywhere in the state, with potential VOC emissions of twenty-five (25) ton per year or more. This source is a flexographic printing source with source-wide potential VOC emissions of greater than 25 tons per year. Therefore, the printing presses constructed after 1980 are subject to this rule.

- (a) Pursuant to 326 IAC 8-5-5(c)(1), the volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water for flexographic presses #16, #17, #18, and #20.
- (b) Pursuant to 326 IAC 8-5-5(f), work practices shall be used to minimize VOC emissions from cleaning operations associated with flexographic presses #16, #17, #18, and #20. Work practices shall include, but not be limited to, the following:

- (1) When not in use, all cleaning materials shall be kept in closed containers.
- (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

Flexographic presses #12, #14 and #15 are not subject to the conditions of 326 IAC 8-5-5(a) and (f) because they were constructed prior to November 1, 1980 and the potential VOC emissions from the source are less than one hundred (100) tons per year.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability - Boilers

326 IAC 6-2-2 (Particulate Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Source of Indirect Heating), the particulate emissions from Boiler 1 and Boiler 2 shall each not exceed 0.52 pounds per million British thermal unit of heat input.

This limit was calculated by the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input

The potential particulate emissions from Boiler 1 and Boiler 2 are 0.002 pounds per MMBtu, each, which is less than 0.52 pounds per MMBtu, each. Therefore, they are able to comply with this rule.

State Rule Applicability - Degreasers

326 IAC 8-3-2 (Cold Cleaner Operation)
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), 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.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
(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 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), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following 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.

Compliance Determination, Monitoring, Record-Keeping and Reporting Requirements

The flexographic printing presses identified as #16, #17, #18, and #20 have applicable compliance determination, monitoring, record-keeping and reporting conditions as specified below:

- (a) Compliance with the VOC content and usage limitations specified in 326 IAC 8-5-5(c)(1) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.
- (b) To document the compliance status with the VOC content and usage limitations, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used less water.
- (c) Pursuant to 40 CFR 60, Subpart RR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, and #20.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on December 18, 2009.

Conclusion

The operation of this stationary printing source shall be subject to the conditions of the attached MSOP Renewal No. M097-28767-00029.

Appendix A: Emission Summary

Company Name: Zimmer Custom- Made Packaging
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
Registration No: M097-28767-00029
Reviewer: Summer Keown
Date: December 28, 2009

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Printing Presses	negl.	negl.	negl.	0.00	38.22	0.00	0.00	0.00	0.00
Natural Gas-Fired Boilers	0.20	0.78	0.78	0.06	0.57	8.65	10.29	0.19 (hexane)	0.19
Degreasers*	0.00	0.00	0.00	0.00	5.00	0.00	0.00	0.00	0.00
Total	0.20	0.78	0.78	0.06	43.78	8.65	10.29	0.19 (hexane)	0.19

*VOC from degreasers is assumed to be equal to or less than five (5) tons per twelve (12) consecutive month period.

**Attachment A: Emissions Calculations
Flexographic Presses**

**Company Name: Zimmer Custom-Made Packaging
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
Permit Number: 097-28767-00029
Reviewer: Summer Keown
Date: December 28, 2009**

Ink Coverage

lbs ink/1000ft ²	1
% coverage	20

Emission Unit	Line Speed (ft/min)	Printing Width (in)	Maximum Printing Rate (MMin ² /hr)	Maximum Coverage (lb/MMin ²)	Max Ink Usage Rate (lbs/hr)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (ton/yr)	Potential Glycol Ether Emissions (ton/yr)
Flexographic Press #12	800	44	25.344	1.39	35.2	1.14	27.27	4.98	0.00
Flexographic Press #14	1,050	44	33.264	1.39	46.2	1.49	35.79	6.53	0.00
Flexographic Press #15	1,000	46	33.12	1.39	46	1.48	35.63	6.50	0.00
Flexographic Press #17	600	45	19.44	1.39	27	0.87	20.92	3.82	0.00
Flexographic Press #16	1,000	55.5	39.96	1.39	55.5	2.96	70.94	12.95	0.00
Flexographic Press #18	500	22	7.92	1.39	11	0.59	14.06	2.57	0.00
Flexographic Press #20	500	45	16.2	1.39	22.5	0.17	4.03	0.74	0.00
	500	45	16.2	1.39	22.5	0.20	4.79	0.88	0.00
Total								38.22	0.00

Presses #12, #14, #15, and #17

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Blue Ink	0.2	7.98	0.03	0.00%
Extender	7.37	7.98	0.92	0.00%
Ink as applied*			0.03	0.00%

*Uses one ounce of extender per gallon of ink

Presses #16, and #18

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Film Ink	0.425	7.98	0.05	0.00%

Press #20

Red Ink	0.07	9.37	0.0075	0.00
Black Ink	0.08	9.01	0.0089	0.00

Methodology

Maximum Printing Rate (MMin²/hr) = Line Speed (ft/min) * 12 (in/ft) * 60 (min/hr) * Printing Width (in) / 10⁶ (in/MMin)

Maximum Coverage (lb/MMin²) = lbs ink/1000ft² * % Coverage/100 / 144 (in²/ft²) * 10⁶ (MMin/in)

Maximum Ink Usage Rate (lb/hr) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²)

Potential VOC Emissions (lb/hr) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²) * lb VOC/lb ink

Potential VOC Emissions (lb/day) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²) * lb VOC/lb ink * 24 (hr/day)

Potential VOC Emissions (ton/yr) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²) * lb VOC/lb ink * 8760 (hr/yr) / 2000 (lb/ton)

Potential Glycol Ether Emissions (ton/yr) = Potential VOC Emissions (ton/yr) * Glycol Ether (wt %)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Company Name: Zimmer Custom-Made Packaging
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
Permit Number: 097-28767-00029
Reviewer: Summer Keown
Date: December 28, 2009

<u>Unit</u>	<u>MMBtu/hr</u>
Boiler 1	11.0
<u>Boiler 2</u>	<u>12.5</u>
Total	23.5

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

23.5

205.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.20	0.78	0.06	10.29	0.57	8.65

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
HAPs Emissions**

Company Name: Zimmer Custom-Made Packaging
Address City IN Zip: 1450 E. 20th Street, Indianapolis, IN 46218
Permit Number: M097-28767-00029
Reviewer: Summer Keown
Date: December 28, 2009

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.162E-04	1.235E-04	7.720E-03	1.853E-01	3.500E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.147E-05	1.132E-04	1.441E-04	3.911E-05	2.162E-04

Methodology is the same as page 3.

Total = 0.19

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Tony Diggs
Zimmer Custom-Made Packaging, Inc
1450 E 20th St
Indianapolis, IN 46218

DATE: April 29, 2010

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

SUBJECT: Final Decision
MSOP
097-28767-00029

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:
Amanda Hennessy (Keramida Environmental, 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.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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April 29, 2010

TO: Indianapolis - Marion County Public Library

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

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

Applicant Name: Zimmer Custom - Made Packaging, Inc
Permit Number: 097-28767-00029

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 4/29/2010 Zimmer Custom Made Packaging 097-28767-00029 (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: CERTIFICATE OF MAILING ONLY	

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		Tony Diggs Zimmer Custom Made Packaging 1450 E 20th St Indianapolis IN 46218 (Source CAATS) via confirmed delivery										
2		David Brown VP - Research & Development Zimmer Custom Made Packaging 1450 E 20th St Indianapolis IN 46218 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
7		Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party)										
8		Ms. Amanda Hennessy Keramida Environmental, Inc. 401 N College Ave Indianapolis IN 46202 (Consultant)										
9		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
10		Indianapolis-Marion County Public Library 2435 North Sherman Drive Indianapolis IN 46218 (Library)										
11												
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