



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: July 14, 2010

RE: Zimmer Custom-Made Packaging / 097 - 29363 - 00029

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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July 14, 2010

Mr. David Brown
Zimmer Custom-Made Packaging, Inc.
1450 East 20th St
Indianapolis, IN 46218

Re: 097-29363-00029
First Notice-Only Change to
M097-28767-00029

Dear Mr. David Brown:

Zimmer Custom-Made Packaging, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M097-28767-00029 on April 29, 2010 for a stationary printing source located at 1450 East 20th St, Indianapolis, IN. On June 16, 2010, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a new flexographic press, identified as Unit ID #21, that is of the same type as the other permitted flexographic presses. The new flexographic press, Unit ID #21, will comply with the same applicable requirements and permit terms and conditions as the other permitted flexographic presses, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. (See attached updated potential to emit calculations.) The addition of the new flexographic press, Unit ID #21, to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13).

In addition, the source has also requested to correct a typographical error associated with Unit ID #16; and remove three (3) flexographic presses, identified as Unit ID #17, Unit ID #18, and Unit ID #20, from the permit. These changes to the permit are considered notice-only changes, pursuant to 326 IAC 2-6.1-6(d)(1) and 2-6.1-6(d)(2), respectively.

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

1. Emission unit descriptions in sections A.2, D.1, and E.1 of the permit have been revised as follows, with subsequent emission unit descriptions renumbered as appropriate:

- ...
- (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.~~ **One (1) flexographic printing press, identified as Unit ID # 21, approved for construction in 2010, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 60 inches, with emission uncontrolled, exhausting to stack S-21.**

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].~~

2. Conditions D.1.1 and D.1.2 of the permit have been revised to include the new press #21 and to remove presses #17, #18, and #20. In addition, due to an error in rule applicability determination in the renewal MSOP #097-28767-00029, presses #12, #14, and #15 were not listed as being subject to 326 IAC 8-5-5. However, as indicated in the Technical Support Document for MSOP #097-15253-00029, flexographic presses #12, #14, and #15 are subject to 326 IAC 8-5-5 (Graphic Arts Operations) because Zimmer Custom-Made Packaging, Inc. was constructed prior to November 1, 1980; and had potential emissions greater than one hundred (100) tons per twelve (12) consecutive month period of VOC. Zimmer Custom-Made Packaging, Inc. no longer has the potential to emit one hundred (100) tons of VOC per twelve (12) consecutive month period, but pursuant to 326 IAC 8-1-1(a), a facility subject to a rule in Article 8 shall "remain subject to such rule notwithstanding any subsequent decrease in VOC emissions." Therefore, conditions D.1.1 and D.1.2 have been revised as follows:

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 **#12, #14, #15, #16, #17, #18, and #20#21**.
- (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 **#12, #14, #15, #16, #17, #18, and #20#21**. Work practices shall include, but not be limited to, the following:

...

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#21**. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

3. Condition E.1.1 of the permit has been revised as follows:

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#21**:

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

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address. The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

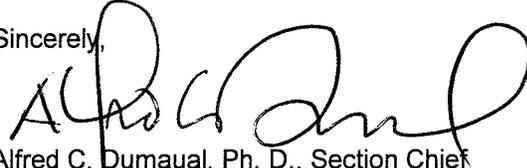
4. IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address. Section A.1 of the permit has been revised as follows:

Mailing Address: _____ 1450 E. 20th Street, Indianapolis, IN 46218

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Christine L. Filutze, of my staff, at 317-233-8397 or 1-800-451-6027, and ask for extension 3-8397.

Sincerely,



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

Attachments: Updated Permit and Updated Calculations

ACD/clf

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



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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	
Original Signed by: Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 29, 2010 Expiration Date: April 29, 2020

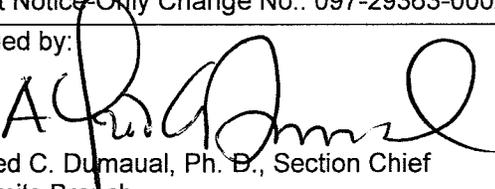
First Notice-Only Change No.: 097-29363-00029	
Issued by:  Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 14, 2010 Expiration Date: April 29, 2020

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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
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 (1) flexographic printing press, identified as Unit ID # 21, approved for construction in 2010, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 60 inches, with emission uncontrolled, exhausting to stack S-21.

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

- (f) 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.

- (g) 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.
- (h) 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 (1) flexographic printing press, identified as Unit ID # 21, approved for construction in 2010, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 60 inches, with emission uncontrolled, exhausting to stack S-21.

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 #12, #14, #15, #16, and #21.
- (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 #12, #14, #15, #16, and #21. 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, and #21. 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:

- (f) 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.
- (g) 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:

- (h) 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 (1) flexographic printing press, identified as Unit ID # 21, approved for construction in 2010, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 60 inches, with emission uncontrolled, exhausting to stack S-21.

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 and #21:

- (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. is : still in operation.

no longer in operation.

I hereby certify that Zimmer Custom-Made Packaging, Inc. is : 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, NSPS
40 CFR 60, Subpart RR**

**Zimmer Custom-Made Packaging, Inc.
1450 E 20th St
Indianapolis, IN 46218**

MSOP NOC No. 097-29363-00029

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]

Appendix A: Emission Summary

Company Name: Zimmer Custom- Made Packaging
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
MSOP NOC No: M097-29363-00029
Reviewer: Christine L. Filutze
Date: June 29, 2010

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Printing Presses	negl.	negl.	negl.	0.00	32.79	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	38.36	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.

**Appendix A: Emissions Calculations
Flexographic Presses**

Company Name: Zimmer Custom-Made Packaging
Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
MSOP NOC No: M097-29363-00029
Reviewer: Christine L. Filutze
Date: June 29, 2010

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 #16	600	45	19.44	1.39	27	1.44	34.51	6.30	0.00
Flexographic Press #21	1,000	60	43.2	1.39	60	1.94	46.48	8.48	0.00
Total								32.79	0.00

Presses #12, #14, #15, and #21

	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

Press #16

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Film Ink	0.425	7.98	0.05	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
MSOP NOC No: 097-29363-00029
Reviewer: Christine L. Filutze
Date: June 29, 2010

<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 **see below	5.5	84
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
MSOP NOC No: 097-29363-00029
Reviewer: Christine L. Filutze
Date: June 29, 2010

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: David Brown
Zimmer Custom-Made Packaging
1450 East 20th St
Indianapolis, IN 46218

DATE: July 14, 2010

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

SUBJECT: Final Decision
MSOP - Notice-Only Change
097 - 29363 - 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:
Ms. 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

Mail Code 61-53

IDEM Staff	LPOGOST 7/14/2010 Zimmer Custom-Made Packaging, Inc. 097 - 29363 - 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		David Brown Zimmer Custom-Made Packaging, Inc. 1450 East 20th St Indianapolis IN 46218 (Source CAATS) Via confirmed delivery										
2		Marion County Health Department 3838 N. Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Ms. Kathryn Watson Improving Kids Environment 8204 Claridge Rd Indianapolis IN 46260 (Affected Party)										
7		Ms. Amanda Hennessy Keramida Environmental, Inc. 401 N College Ave Indianapolis IN 46202 (Consultant)										
8		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
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