



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 19, 2011

RE: Continental Mirrored Graphics, Inc / 039-30231-00613

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

**Continental Mirrored Graphics
1838 Middlebury Road
Elkhart, Indiana 46516**

(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.: M039-30231-00613	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 18, 2011 Expiration Date: July 18, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary graphic arts operation.

Source Address:	1838 Middlebury Road, Elkhart, Indiana 46516
General Source Phone Number:	(574) 522-7983
SIC Code:	2759 & 3211
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) screen printed glass line, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, constructed in 2004, and exhausting to stacks D3 and D4.
- (b) One (1) natural gas-fired air make-up unit, identified as A1, with a maximum heat input of 0.15 MMBtu per hour, and exhausting to stack A1.
- (c) Ten (10) natural gas-fired DTH tube heaters, with a maximum heat input of 0.15 MMBtu per hour, each, and exhausting to stacks B6 through B10.
- (d) Thirteen (13) natural gas-fired DBS tube heaters, with a maximum heat input of 0.075 MMBtu per hour, each, and exhausting to stacks B3 through B5.
- (e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour, each, and exhausting to stack B1.
- (f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, and exhausting to stack B11.
- (g) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2006, and exhausting to stacks D1 and D2.
- (h) Two (2) natural gas-fired print cure ovens, identified as D3 and D4, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2004, and exhausting to stacks D3 and D4.

- (i) One (1) mirror production line, identified as D1, with a maximum throughput of 3886 square feet of glass per hour, utilizing flow-coating, constructed in 2006, and exhausting to stacks D1 and D2.

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, M039-30231-00613, 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) 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.The Permittee shall implement the PMPs.
- (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 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.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) 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.
- (d) 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 M039-30231-00613 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator 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 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(2), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.17 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) 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 [326 IAC 2-6.1-5(a)(1)]:

- (i) One (1) mirror production line, identified as D1, with a maximum throughput of 3886 square feet of glass per hour, utilizing flow-coating, constructed in 2006, and exhausting to stacks D1 and D2.

(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 8-1-6]

The VOC content delivered to the one (1) mirror production line, identified as D1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with this limit shall limit the VOC emissions from this line to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the one (1) mirror production line, identified as D1. Section B - Preventative Maintenance Plan contains this 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 usage limitation 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 2-5.1-3(e)(2)][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 records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent used less water on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The volume weighted VOC content of the coatings used for each month;

- (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOC emitted for each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour, each, and exhausting to stack B1.
- (f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, and exhausting to stack B11.

(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 [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), particulate emissions for the sawdust wood waste-fired hot water heater, identified as EP 7, shall be limited to the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
- Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For a total source maximum operating capacity rating (Q) less than 10 MMBtu/hr, particulate emissions (Pt) shall not exceed 0.6 pound per MMBtu of heat input. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1 pound per MMBtu of heat input.

Indiana Department of Environmental Management Office of Air Quality Compliance and Enforcement Branch

Quarterly Report

Source Name: Continental Mirrored Graphics
Source Address: 1838 Middlebury Road, Elkhart, Indiana 46516
MSOP Permit No.: M039-30231-00613
Source: mirror production line, identified as D1
Pollutant: VOC input
Limit: The input of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

Year: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**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:	Continental Mirrored Graphics
Address:	1838 Middlebury Road
City:	Elkhart, Indiana 46516
Phone #:	(574) 522-7983
MSOP #:	M039-30231-00613

I hereby certify that Continental Mirrored Graphics is : still in operation.
 no longer in operation.
I hereby certify that Continental Mirrored Graphics is : in compliance with the requirements of MSOP M039-30231-00613.
 not in compliance with the requirements of MSOP M039-30231-00613.

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:

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

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

Source Background and Description

Source Name:	Continental Mirrored Graphics
Source Location:	1838 Middlebury Road, Elkhart, IN 46516
County:	Elkhart
SIC Code:	2759 & 3211
Permit Renewal No.:	M039-30231-00613
Permit Reviewer:	Meredith W. Jones/Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Continental Mirrored Graphics relating to the operation of a stationary graphic arts operation.

History

On February 16, 2011, Continental Mirrored Graphics submitted an application to the OAQ requesting to renew its operating permit. Continental Mirrored Graphics was issued MSOP No. M039-23420-00613 on December 20, 2006.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) screen printed glass line, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, constructed in 2004, and exhausting to stacks D3 and D4.
- (b) One (1) natural gas-fired air make-up unit, identified as A1, with a maximum heat input of 0.15 MMBtu per hour, and exhausting to stack A1.
- (c) Ten (10) natural gas-fired DTH tube heaters, with a maximum heat input of 0.15 MMBtu per hour, each, and exhausting to stacks B6 through B10.
- (d) Thirteen (13) natural gas-fired DBS tube heaters, with a maximum heat input of 0.075 MMBtu per hour, each, and exhausting to stacks B3 through B5.
- (e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour, each, and exhausting to stack B1.
- (f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, and exhausting to stack B11.
- (g) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2006, and exhausting to stacks D1 and D2.
- (h) Two (2) natural gas-fired print cure ovens, identified as D3 and D4, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2004, and exhausting to stacks D3 and D4.
- (i) One (1) mirror production line, identified as D1, with a maximum throughput of 3886 square feet of glass per hour, utilizing flow-coating, constructed in 2006, and exhausting to stacks D1 and D2.

Existing Approvals

The source was issued MSOP No. M039-23420-00613 on December 20, 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.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 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	Not designated.

¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) *Ozone Standards*
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) *PM_{2.5}*
Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) *Other Criteria Pollutants*
Elkhart 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.

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, each. 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 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.
- (c) 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.

<i>Process (Emission Unit)</i>	Potential To Emit (tons/year)								
	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SO₂</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
Screen Printed Glass Line	-	-	-	-	-	24.75	-	9.53	6.94 (toluene)
Natural Gas Combustion	0.09	0.36	0.36	0.03	4.79	0.26	4.03	0.09	0.09 (hexane)
Mirror Production Line (D1)	-	-	-	-	-	<25	-	9.90	9.90 (lead compounds)
Total PTE of Entire Source	0.09	0.36	0.36	0.03	4.79	<50.01	4.03	19.52	9.90 (lead compounds)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (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) *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

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Glass Manufacturing Plants (40 CFR 60, Subpart CC) (326 IAC 12) are not included in the permit because the source does not manufacture glass.
- (b) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing (40 CFR 60, Subpart QQ) (326 IAC 12) are not included in the permit because the source does not have a rotogravure printing press and does not print paper products.
- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing (40 CFR 60, Subpart FFF) (326 IAC 12) are not included in the permit because the source does not contain a rotogravure printing line and does not print or coat flexible vinyl or urethane products.
- (d) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities (40 CFR 60, Subpart VVV) (326 IAC 12) are not included in the permit because the source does not contain either a coating operation or any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (326 IAC 20-18) are not included in the permit because the source does not operate any publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (326 IAC 20-65) are not included in the permit because the source does not contain any paper or other web coating operations and is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (326 IAC 20-77) are not included in the permit because the source does not print, coat, or dye fabric or other textiles and is not a major source of HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources (40 CFR Part 63, Subpart SSSSS) (326 IAC 20) are not included in the permit because the source does not manufacture glass.
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit for this source.

Compliance Assurance Monitoring (CAM)

- (k) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM), is not included in the permit because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

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 subject to the requirements of 326 IAC 2-6 because it has the potential to emit greater than 5 tons per year of lead. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

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

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

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 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Screen Printed Glass Line

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The one (1) screen printed glass line is not subject to the requirements of 326 IAC 6-3-2 because particulate emissions from this process are less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The one (1) screen printed glass line is not subject to the requirements of 326 IAC 8-1-6 because the unlimited potential VOC emissions from this facility are less than twenty-five (25) tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

The one (1) screen printed glass line is not subject to the requirements of 326 IAC 8-2-5 because this emission unit does not coat paper, plastic, metal foil, or pressure sensitive tape or pressure sensitive labels.

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

The one (1) screen printed glass line is not subject to the requirements of 325 IAC 8-5-5 because this facility does not conduct packaging rotogravure, publication rotogravure, or flexographic printing.

Natural Gas Combustion

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The one (1) natural gas-fired air make-up unit identified as A1, the ten (10) natural gas-fired DTH tube heaters, the thirteen (13) natural gas-fired DBS tube heaters, the two (2) natural gas-fired paint cure ovens identified as D1 and D2, and the two (2) natural gas-fired print cure ovens identified as D3 and D4, are not subject to the requirements of 326 IAC 6-2 because none of these emission units are sources of indirect heating.
- (b) The three (3) natural gas-fired hot water heaters with a maximum heat input of 0.919 MMBtu per hour, each, and the one (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, are subject to the requirements of 326 IAC 6-2-4 because each facility began operation after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the following indirect heating facilities shall be limited to the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For a total source maximum operating capacity rating (Q) less than 10 MMBtu/hr, particulate emissions (Pt) shall not exceed 0.6 pound per MMBtu of heat input. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1 pound per MMBtu of heat input.

The source is able to comply with this limit without the use of a control device.

Mirror Production Line (D1)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The one (1) mirror production line, identified as D1, is not subject to the requirements of 326 IAC 6-3-2 because pursuant to 326 IAC 6-3-1(b)(6) and (7) surface coating using roll coating and surface coating using flow coating, respectively, are exempt from the rule.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The one (1) mirror production line, identified as D1, would be subject to the requirements of 326 IAC 8-1-6 because the unlimited potential VOC emissions from this facility are greater than twenty-five (25) tons per year. However, the VOC content delivered to the mirror production line shall be limited to less than twenty-five (25) tons per twelve (12) month consecutive period. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-5 (Paper Coating Operations)

The one (1) mirror production line, identified as D1, is not subject to 326 IAC 8-2-5 (Paper Coating Operations) because this emission unit does not coat paper, plastic, metal foil, or pressure sensitive tape or pressure sensitive labels.

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

The one (1) mirror production line, identified as D1, is not subject to the requirements of 325 IAC 8-5-5) because this facility does not conduct packaging rotogravure, publication rotogravure, or flexographic printing.

Compliance Determination and Monitoring Requirements

There are no compliance determination or compliance monitoring requirements applicable to this source.

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 February 16, 2011.

Conclusion

The operation of this stationary graphic arts operation shall be subject to the conditions of the attached MSOP Renewal No. M039-30231-00613.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings 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

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, IN 46516
MSOP No.: M039-30231-00613
Reviewer: Summer Keown
Date: May 13, 2011

****Potential to Emit Summary (tons/yr)****

Unlimited

<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SO_x</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>
Screen Printed Glass Line	-	-	-	-	-	24.75	-	9.53	6.94 TOLUENE
Natural Gas Combustion	0.09	0.36	0.36	0.03	4.79	0.26	4.03	0.09	0.09 Hexane
Mirror Production Line (D1)	-	-	-	-	-	53.61	-	9.90	9.90 Lead Compounds
Total	0.09	0.36	0.36	0.03	4.79	78.63	4.03	19.52	9.90 Lead Compounds

Limited

<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SO_x</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>
Screen Printed Glass Line	-	-	-	-	-	24.75	-	9.53	6.94 TOLUENE
Natural Gas Combustion	0.09	0.36	0.36	0.03	4.79	0.26	4.03	0.09	0.09 Hexane
Mirror Production Line (D1)	-	-	-	-	-	<25	-	9.90	9.90 Lead Compounds
Total	0.09	0.36	0.36	0.03	4.79	<50.01	4.03	19.52	9.90 Lead Compounds

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, IN 46516
MSOP No.: M039-30231-00613
Reviewer: Summer Keown
Date: May 13, 2011

****Screen Printed Glass Line****

PRODUCT NAME	MAXIMUM THROUGHPUT (GAL/HR)	DENSITY (LBS/GAL)	VOC CONTENT (LBS/GAL)	WEIGHT % XYLENE	WEIGHT % METHANOL	WEIGHT % TOLUENE	WEIGHT % METHYL ISOBUTYL	WEIGHT % DIETHYLENE GLYCOL
PURE LACQUER THINNER	0.377	7.00	7.00	0%	10%	60%	10%	0%
SIMULATED ETCH	0.0585	9.00	4.69	0%	1%	0%	0%	0%
EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER)	0.00025	7.76	4.47	0%	58%	0%	0%	0%
KRINKLE TEX PART A	0.002	8.92	3.24	0%	0%	0%	0%	0%
KRINKLE TEX PART B	0.0025	8.62	3.51	0%	0%	0%	0%	0%
LEADED EFFECT CLEAR	0.035	9.75	0.64	0%	0%	0%	0%	1%
BUTYL CELLOSOLVE	0.224	7.5	7.5	0%	0%	0%	0%	0%
MBI68 ink black	0.001	8.92	3.59	0%	0%	0%	0%	0%
Metallic Base Et-6002	0.0045	9.09	3.53	0%	0%	0%	0%	0%
MBI 29 Smooth Silver	0.0075	9.83	2.68	0%	0%	0%	0%	0%
CS Crystal Coast -CC-006 Part B	0.122	8.9	3.66	5%	0%	0%	0%	0%
OC-004 PART owR	0.131	8.54	4.04	0%	0%	0%	0%	0%
2 PART EPOXY BLACK ET-6053	0.0025	8.92	1.66	0%	0%	0%	0%	0%

Potential to Emit (tons/yr)

PRODUCT NAME	VOC	XYLENE	METHANOL	TOLUENE	METHYL ISOBUTYL KETONE	DIETHYLENE GLYCOL	Total HAPs
PURE LACQUER THINNER	11.56	0.00	1.16	6.94	1.16	0.00	9.25
SIMULATED ETCH	1.20	0.00	0.02	0.00	0.00	0.00	0.02
EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
KRINKLE TEX PART A	0.03	0.00	0.00	0.00	0.00	0.00	0.00
KRINKLE TEX PART B	0.04	0.00	0.00	0.00	0.00	0.00	0.00
LEADED EFFECT CLEAR	0.10	0.00	0.00	0.00	0.00	0.01	0.01
BUTYL CELLOSOLVE	7.36	0.00	0.00	0.00	0.00	0.00	0.00
MBI68 ink black	0.02	0.00	0.00	0.00	0.00	0.00	0.00
Metallic Base Et-6002	0.07	0.00	0.00	0.00	0.00	0.00	0.00
MBI 29 Smooth Silver	0.09	0.00	0.00	0.00	0.00	0.00	0.00
CS Crystal Coast -CC-006 Part B	1.96	0.24	0.00	0.00	0.00	0.00	0.24
OC-004 PART owR	2.32	0.00	0.00	0.00	0.00	0.00	0.00
2 PART EPOXY BLACK ET-6053	0.02	0.00	0.00	0.00	0.00	0.00	0.00
Total	24.75	0.24	1.18	6.94	1.16	0.01	9.53

Methodology

Potential to Emit VOC (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * VOC CONTENT (LBS/GAL) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit HAP (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * DENSITY (LBS/GAL) * WEIGHT % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, IN 46516
MSOP No.: M039-30231-00613
Reviewer: Summer Keown
Date: May 13, 2011

****Natural Gas Combustion (MMBtu/Hr <100)****

This source contains:

One (1) air make-up unit (A1), with a heat input capacity of	0.15	MMBtu/hr.
Ten (10) DTH tube heaters, each with a heat input capacity of	0.15	MMBtu/hr.
Thirteen (13) DBS tube heaters, each with a heat input capacity of	0.075	MMBtu/hr.
Three (3) hot water heaters, each with a heat input capacity of	0.919	MMBtu/hr.
One (1) water heater, with a heat input capacity of	0.1999	MMBtu/hr.
Two (2) paint cure ovens (D1 and D2), each with a heat input capacity of	1.34	MMBtu/hr.
Two (2) print cure ovens (D3 and D4), each with a heat input capacity of	1.34	MMBtu/hr.

Total Heat Input Capacity (MMBtu/hr) = 10.94

Total Potential Throughput (MMCF/yr) = 95.85

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emissions (tons/yr)	0.09	0.36	0.36	0.03	4.79	0.26	4.03

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

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

	HAPs: Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03
Potential Emissions (tons/yr)	1.01E-04	5.75E-05	3.59E-03	0.09	1.63E-04

	HAPs: Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	2.40E-05	5.27E-05	6.71E-05	1.82E-05	1.01E-04

Total HAPs (tons/yr) = 0.09

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, IN 46516
MSOP No.: M039-30231-00613
Reviewer: Summer Keown
Date: May 13, 2011

****Mirror Production Line (D1)****

PRODUCT NAME	MAXIMUM THROUGHPUT (GAL/HR)	DENSITY (LBS/GAL)	VOC CONTENT (LBS/GAL)	Weight % Lead Compounds	PTE VOC (TONS/YR)	PTE Lead Compounds (TONS/YR)
Hilemn sureguard dark gray low lead	2.75	12.11	3.70	5%	44.57	7.29
Ethylene Glycol	0.275	7.51	7.51	0%	9.05	0.00
Betashield 3500 Rollcoat	1.10	13.51	0.00	4%	0.00	2.60
Total					53.61	9.90

Methodology

Potential to Emit VOC (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * VOC CONTENT (LBS/GAL) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit Lead Compounds (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * DENSITY (LBS/GAL) * Weight % Lead Compounds * (8760 hrs/yr) * (1 ton/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Chris Robinson
Continental Mirrored Graphics, Inc
1838 Middlebury Rd
Elkhart, IN 46516

DATE: July 19, 2011

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

SUBJECT: Final Decision
MSOP
039-30231-00613

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:
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

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
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July 19, 2011

TO: Elkhart Public Library

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

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

Applicant Name: Continental Mirrored Graphics
Permit Number: 039-30231-00613

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	CDENNY 07/19/2011 Continental Mirrored Graphics, Inc 039-30231-00613 (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	Handling 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		Chris Robinson Continental Mirrored Graphics, Inc 1838 Middlebury Rd Elkhart IN 46516 (Source CAATS)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
7		Ms. Stephanie Redding American Consulting PO Box 59 Osceola IN 46561 (Consultant)									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
9											
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