



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: June 27, 2011

RE: Graphic Packaging International, Inc. / 091 - 30303 - 00099

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



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

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

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

(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.: M091-30303-00099	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 27, 2011 Expiration Date: June 27, 2021

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12 Permit Renewal [326 IAC 2-6.1-7]	
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14 Source Modification Requirement	
B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17 Annual Fee Payment [326 IAC 2-1.1-7]	
B.18 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

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

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 17

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

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

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 29

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.2.3 Particulate Control
- D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

- D.2.5 Cyclone Failure Detection

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

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

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
- D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- D.3.3 Record Keeping Requirement

Annual Notification 23

Malfunction Report 24

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 food industry printed packaging process.

Source Address:	115 Koomler Drive, LaPorte, Indiana 46350
General Source Phone Number:	(219) 324-6160
SIC Code:	2631
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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) 32-inch Web-fed UV lithographic printing press, identified as Press 1, constructed in 1988 and modified in 2009 with the addition of a coater unit, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV1a. The press is equipped with one (1) natural gas-fired dryer with a maximum heat input capacity of 1.50 MMBtu/hr.
- (b) One (1) 40-inch Web-fed offset lithographic printing press, identified as Press 2, constructed in 1992, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV2a and SV2b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-3, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (c) One (1) 32-inch Web-fed offset lithographic printing press, identified as Press 3, constructed in 1998, with a maximum capacity of 700 feet per minute using no control equipment and exhausting to stack SV3a and SV3b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-4, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (d) Two (2) water-based adhesive gluers, identified as gluer #1 and #2, each with a maximum capacity of 5.11 pounds per hour of glue. Gluer #1 was constructed in 1993 and Gluer #2 was constructed in 1998. All adhesives are applied by rollers or extrusion.
- (e) Two (2) natural gas-fired make up air units, identified as FCU-1, with a combined maximum heat input capacity of 5.8 MMBtu/hr. The make up air units were constructed in 1993.

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

SECTION B GENERAL CONDITIONS

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

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, M091-30303-00099, 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 M091-30303-00099 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.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 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:

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

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

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

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

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

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

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

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

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

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

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Control

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

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM and PM-10 testing for the paper baling operation collection system utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Cyclone failure can be indicated by a significant drop in the cyclone 's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) 40-inch Web-fed offset lithographic printing press, identified as Press 2, constructed in 1992, with a maximum capacity of 800 feet per minute using no control equipment and exhausting to stack SV2a and SV2b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-3, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (c) One (1) 32-inch Web-fed offset lithographic printing press, identified as Press 3, constructed in 1998, with a maximum capacity of 700 feet per minute using no control equipment and exhausting to stack SV3a and SV3b. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) natural gas-fired dryer, identified as FCU-4, with a maximum heat input capacity of 1.50 MMBtu/hr.
- (k) One (1) 33.5-inch Web-fed UV light lithographic printing press, identified as Press 4, with a maximum capacity of 1,300 feet per minute using no control equipment and exhausting to stack SV4a through SV4c. The press is followed by a flexographic coating application process and can use either UV or aqueous-based inks and coatings. The press is equipped with one (1) electric dryer and is approved for construction in 2007.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.3.3 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**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:	Graphic Packaging International, Inc.
Address:	115 Koomler Drive
City:	LaPorte, Indiana 46350
Phone #:	(219) 324-6160
MSOP #:	M091-30303-00099

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

no longer in operation.

I hereby certify that Graphic Packaging International, Inc. is: in compliance with the requirements of MSOP M091-30303-00099.

not in compliance with the requirements of MSOP M091-30303-00099.

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 Renewal

Source Background and Description

Source Name:	Graphic Packaging International, Inc.
Source Location:	115 Koomler Drive, LaPorte, IN 46350
County:	LaPorte
SIC Code:	2657, 2752
Permit Renewal No.:	M091-30303-00099
Permit Reviewer:	Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Graphic Packaging International, Inc. relating to the operation of a stationary food industry printed packaging process. On March 3, 2011, Graphic Packaging International, Inc. submitted an application to the OAQ requesting to renew its operating permit. Graphic Packaging International, Inc. was issued MSOP No. M091-24283-00099 on August 29, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

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

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

Existing Approvals

Since the issuance of the MSOP No. M091-24283-00099 on August 29, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) First Notice-Only Change No. 091-26265-00099, issued on March 31, 2008;
- (b) Second Notice-Only Change No. 091-26869-00099, issued on August 25, 2008; and
- (c) Third Notice-Only Change No. 091-27970-00099, issued on June 11, 2009.

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.

Air Pollution Control Justification as an Integral Part of the Process

In 2007, the Permittee submitted information requesting that the pneumatic conveyance system (consisting of a blower/vacuum and three (3) cyclones to collect paper scrap) be considered integral to the process for the paper baling operation. IDEM, OAQ evaluated the justifications and agreed that the pneumatic conveyance system will be considered integral to the process. This evaluation and approval was discussed in MSOP No. M091-24283-00099, issued on August 29, 2007.

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 LaPorte 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.

¹Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which 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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

LaPorte 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

LaPorte 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

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

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Printing Presses	0.00	0.00	0.00	0.00	0.00	64.80	0.00	negl.	negl.
Gluers	0.00	0.00	0.00	0.00	0.00	8.95	0.00	0.11	negl.
Baling Operations	16.16	16.16	16.16	0.00	0.00	0.00	0.00	0.00	0.00
Plate Room	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.01	negl.
Natural Gas Combustion	0.11	0.46	0.46	0.04	6.00	0.33	5.04	0.11	0.11 (hexane)
Total PTE of Entire Source	16.28	16.62	16.62	0.04	6.00	74.23	5.04	0.23	0.11 (hexane)
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 (PM10), 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 regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

- (a) 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.

- (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 still not included in the permit for the printing presses. This source is not subject to this rule because all presses are lithographic and not publication rotogravure printing presses.
- (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 still not included in the permit for the printing presses. This source is not subject to this rule because all presses are lithographic and not rotogravure printing presses used to print or coat flexible vinyl or urethane products.
- (d) The requirements of New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included in this permit, since this source does not perform polymeric coating of supporting substrates, defined as web coating process that apply elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil (40 CFR 60.741). This source only contains lithographic presses printing on paperboard.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are still not included in the permit for the degreasing operations because they do not use halogenated solvents.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (326 IAC 20-18) are not included in this permit because the source is not a major source of HAPs and this source does not contain publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses. This source only contains lithographic presses.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ (326 IAC 20-65) are not included in the permit because the source is not a major source of HAPs and web coating in lithography are exempted from this rule under 40 CFR 63.3300(c).
- (i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

This existing source is not in 1 of the 28 source categories defined in 326 IAC 2-2 and the potential to emit for the entire source will remain below the 250 tons per year PSD threshold. Therefore, the source is not subject to the provisions of 326 IAC 2-2.

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

The source has the potential to emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

Natural Gas-Fired Make Up Air Units, Heaters and Dryers

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

The natural gas fired make up units, heaters and dryers (FCU-1, FCU-2, FCU-3, and FCU-4) are not indirect heating units. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply to the make up units, heaters or dryers.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions from each of make up units, heater, and dryers (FCU-1, FCU-2, FCU-3, and FCU-4) are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable to the make up units, heaters, and dryers.

State Rule Applicability – Printing Presses and Gluers

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

All coatings, inks and adhesives are applied using roll coating or extrusion. Pursuant to 326 IAC 6-3-1(b)(6), the adhesive gluers and printing presses the gluer operations are not subject 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

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

The printing presses (Press 1, 2, 3, and 4) are not subject to 326 IAC 8-5-5 because the presses are lithographic printing presses. 326 IAC 8-5-5 applies only to packaging rotogravure, publication rotogravure, and flexographic printing.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The uncontrolled potential VOC emissions from each of the printing presses (Press 1, 2, 3, and 4) and the gluers (gluer 1, 2, 3, and 4) are each less than twenty-five (25) tons per year. Therefore, the printing presses (Press 1, 2, 3 and 4) are not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-2-5 (Paper Coating)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after January 1, 1980, located in any county, with a potential to emit greater than or equal to twenty-five (25) tons of VOCs per year and facilities constructed after January 1, 1990, located in any county, and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

- (a) The requirements of 326 IAC 8-2-5 are not applicable to Press 1, which was constructed in 1988, since it does not have the potential to emit greater than or equal to twenty-five (25) tons of VOCs per year.
- (b) The requirements of 326 IAC 8-2-5 are applicable to Press 2, 3, and 4, which were constructed in 1992, 1998, and 2007, respectively, since each has potential emissions greater than fifteen (15) pounds of VOC per day before add-on controls.

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

326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)

The requirements of 326 IAC 8-16 apply to sources in Lake County or Porter County containing offset lithographic printing operations and letterpress printing operations. This source is located in LaPorte County. Therefore, the requirements of 326 IAC 8-16 do not apply to the printing presses.

State Rule Applicability – Degreasing Operation

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability – Paper Baling Operation

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

- (a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Paper Baling Operation shall not exceed 6.63 pounds per hour when operating at a process weight rate of 2.05 tons per hour.

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

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

The uncontrolled potential PM from the Paper Baling Operation is 18.45 pounds per hour. Because the uncontrolled potential PM is greater than the allowable particulate emission rate, the Permittee shall operate the cyclones and control emissions from the paper baling operation at all times that the pneumatic collection system is in operation in order to comply with the 326 IAC 6-3 limits.

- (b) The plate room and the shrink wrap machine are not a source of particulate emissions. Therefore, 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) does not apply to these units.

Compliance Determination and Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

The paper baling operation, identified as 203-101, has applicable compliance determination conditions as specified below:

- (a) The cyclones for particulate control shall be in operation and control emissions from the paper baling operation at all times that the pneumatic collection system is in operation.
- (b) In the event that cyclone failure is observed:
- (1) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit.
 - (2) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit.

Cyclone failure can be indicated by a significant drop in the cyclone's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the cyclone must operate properly to comply with 326 IAC 6-3-2.

Recommendation

The staff recommends to the Commissioner that MSOP Renewal No. M091-30303-00099 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 March 3, 2011.

Conclusion

The operation of this stationary food industry printed packaging process shall be subject to the conditions of the attached MSOP Renewal No. M091-30303-00099.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (b) A copy of the 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

Attachment A: Emissions Summary

Company Name: Graphic Packaging International, Inc.
Address City IN Zip: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Uncontrolled Potential Emissions

Emissions Unit	PM	PM10	PM2.5	SO₂	NOx	VOC	CO	Single HAP	Total HAPs
Printing Presses (1, 2, 3 and 4)	--	--	--	--	--	64.80	--	negl.	negl.
Gluers (1, 2, 3 and 4)	--	--	--	--	--	8.95	--	negl.	0.11
Baling Operations*	80.81	80.81	80.81	--	--	--	--	--	--
Plate Room	--	--	--	--	--	0.15	--	negl.	0.01
Natural Gas Combustion	0.11	0.46	0.46	0.04	6.00	0.33	5.04	0.11 (hexane)	0.11
Total	80.93	81.27	81.27	0.04	6.00	74.23	5.04	0.11 (hexane)	0.23

Controlled Potential Emissions

Emissions Unit	PM	PM10	PM2.5	SO₂	NOx	VOC	CO	Single HAP	Total HAPs
Printing Presses (1, 2, 3 and 4)	--	--	--	--	--	64.80	--	negl.	negl.
Gluers (1, 2, 3 and 4)	--	--	--	--	--	8.95	--	negl.	0.11
Baling Operations*	16.16	16.16	16.16	--	--	--	--	--	--
Plate Room	--	--	--	--	--	0.15	--	negl.	0.01
Natural Gas Combustion	0.11	0.46	0.46	0.04	6.00	0.33	5.04	0.11 (hexane)	0.11
Total	16.28	16.62	16.62	0.04	6.00	74.23	5.04	0.11 (hexane)	0.23

*IDEM, OAQ has evaluated the justification and agreed that the pneumatic scrap conveyance system will be considered as an integral part of the paper baling operation

**Appendix A: Emission Calculations
Paper Baling Operations, PM Emissions**

Company Name: Graphic Packaging International, Inc.
Address: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Material	Maximum Scrap Generation (tons/yr)	Controlled PM/PM10 Emission Factor (lbs/ton) *	PTE PM/PM10 Before Control (lbs/hr)	PTE PM/PM10 Before Control (tons/yr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PTE PM/PM10 After Control (lbs/hr)	PTE PM/PM10 After Control (tons/yr)
Baling Operations	17,958	1.80	18.45	80.81	6.63	3.69	16.16

* Emission factor is the result of a stack test conducted at a similar paper baling operation (Color-Box LLC, Registration 097-15013-00312 issued February 26, 2002). Uncontrolled emissions were calculated using an assumed control efficiency at the cyclone operation 80%. IDEM, OAQ has evaluated the justification and agreed that the pneumatic scrap conveyance system described above will be considered as an integral part of the paper baling operation.

Methodology

PTE PM/PM10, After Control (lbs/hr) = Maximum Scrap Generation (tons/yr) x PM/PM10 emission factor (lbs/ton)

PTE PM/PM10, Before Controls (tons/yr) = PTE PM/PM10, After Controls (lbs/yr) x 1 ton/2000 lbs x 1 / (1 - Control Efficiency %)

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

Company Name: Graphic Packaging International, Inc.
Address City IN Zip: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

	Max Machine Speed (ft/min)	Max. Sheet Width (inches)	Operating Schedule (hrs/yr)*	Type of Material Applied or Used	Max Sheet Coverage**	Area Printed/ Coated (ft2/hr)	Material Usage Factors	Material Usage Factor Units	Maximum Usage (lb/hr)	Maximum Usage (lb/yr)	Max VOC Content (wt %)	PTE VOC (lb/hr)	PTE VOC (tons/yr)	Total PTE (lb/hr)	Total PTE (lb/day)	Total VOC (tons/yr)	Constructed
Press 4	1300	33.4	7884	UV Ink	120%	260,520	0.00024	lb/ft2 printed	75.0	591,535	0.01%	0.008	0.03	5.8	139.9	22.98	2007
				Coating	100%	217,100	0.00031	lb/ft2 coated	67.3	530,601	2.40%	1.62	6.37				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	8.88	69,998	30%	2.66	10.50				
				UV Wash Solution	na	na	0.022	lbs/lb ink used	1.62	12,805	95%	1.54	6.08				
Press 1	800	32	7884	UV Ink	120%	153,600	0.00024	lb/ft2 printed	36.34	286,527	0.01%	0.004	0.01	3.4	81.6	13.40	1988
				Coating	100%	128,000	0.00031	lb/ft2 coated	39.09	308,152	2.40%	0.94	3.70				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	5.15	40,601	30%	1.54	6.09				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	0.96	7,569	95%	0.91	3.60				
Press 2	800	40	7884	UV Ink	120%	192,000	0.00024	lb/ft2 printed	45.43	429,790	0.01%	0.005	0.02	4.2	101.7	16.70	1992
				Coating	100%	160,000	0.00030	lb/ft2 coated	48.40	381,586	2.40%	1.16	4.58				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	6.44	50,751	30%	1.93	7.61				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	1.20	9,461	95%	1.14	4.49				
Press 3	700	32	7884	UV Ink	120%	134,400	0.00024	lb/ft2 printed	31.80	300,853	0.01%	0.003	0.01	3.0	71.4	11.72	1998
				Coating	100%	112,000	0.00031	lb/ft2 coated	34.20	269,633	2.40%	0.82	3.24				
				Fountain Solutions	na	na	0.142	lbs/lb ink used	4.51	35,526	30%	1.35	5.33				
				UV Wash Solution	na	na	0.026	lbs/lb ink used	0.84	6,623	95%	0.80	3.15				

Total = 64.80

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

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

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

Methodology

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

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

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

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

**Appendix A: Emission Calculations
Plate Room, VOC and HAP Emissions**

Company Name: Graphic Packaging International, Inc.
Address: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Material	Density (lbs/gal)	VOC (wt%)	HAPs		Maximum Usage Rate (gallons/yr)	VOC (lbs/gallon)	PTE VOC (lbs/hr)	PTE VOC (tons/yr)	PTE HAPs (tons/yr)
			Weight % Ethylene Glycol	Weight % Methanol					
Plate developer	8.34	9.00%	-	-	375	0.75	0.03	0.14	0
Plate finisher	8.34	6.00%	6.00%	-	18.0	0.50	1.03E-03	4.50E-03	4.50E-03
Glass cleaner	8.34	17.0%	-	17.0%	2.00	1.42	3.24E-04	1.42E-03	1.42E-03
Film cleaner	5.70	100%	-	-	1.00	5.70	6.51E-04	2.85E-03	0
Total								0.15	0.01

Methodology

VOC (lbs/gallon) = Density (lbs/gal) x VOC (wt%)

PTE VOC (lbs/hr) = VOC (lbs/gallon) x Max. Usage Rate (gallons/yr) x 1 yr/8,760hrs

PTE VOC (tons/yr) = PTE VOC (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Gluer (#1 through #4), VOC and HAP Emissions**

Company Name: Graphic Packaging International, Inc.
Address: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Material	Maximum Usage Rate (lbs/hr)	Maximum Usage Rate (lbs/yr)	VOC (wt%)	Total HAP (wt%) *	PTE VOC (lbs/hr)	PTE VOC (tons/yr)	PTE HAP (tons/yr)
Gluer #1	5.11	44,764	10.0%	0.13%	0.51	2.24	0.028
Gluer #2	5.11	44,764	10.0%	0.13%	0.51	2.24	0.028
Gluer #3	5.11	44,764	10.0%	0.13%	0.51	2.24	0.028
Gluer #4	5.11	44,764	10.0%	0.13%	0.51	2.24	0.028
Total						8.95	0.11

* Total HAP includes acetaldehyde, formaldehyde, and vinyl acetate.

Methodology

PTE VOC (lbs/hr) = Max. Usage Rate (gal/yr) x VOC (wt%) x 1 yr/8,760hrs

PTE VOC (tons/yr) = PTE VOC (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

PTE HAP (lbs/hr) = Max. Usage Rate (gal/yr) x Total HAP (wt%) x 1 yr/8,760hrs

PTE HAP (tons/yr) = PTE HAP (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Graphic Packaging International, Inc.
Address: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Emission Unit	Max. Heat Input Capacity (MMBtu/hr)	
Space Heaters	2.20	***
Press 1 Dryer	1.50	
Press 2 Dryer	1.50	
Press 3 Dryer	1.50	
Make-up Air Units	5.80	
Shrink Wrap Heater	1.47	

Total Heat Input Capacity
(MMBtu/hr)
14.0

Potential Throughput
(MMSCF/yr)
120

Pollutant

Emission Factor (lb/MMSCF)	PM*	PM10*	SO2	NOx**	VOC	CO
	1.9	7.6	0.60	100	5.5	84.0
Potential to Emit (tons/yr)	0.11	0.46	0.04	6.00	0.33	5.04

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

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

*** Total heat input capacity for eleven space heaters, each rated at 0.2 MMBtu/hr.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100

Company Name: Graphic Packaging International, Inc.
Address: 115 Kloomer Drive, LaPorte, Indiana 46350
Permit Number: M091-30303-00099
Reviewer: Summer Keown
Date: March 24, 2011

Total Heat Input Capacity
(MMBtu/hr)
14.0

Potential Throughput
(MMSCF/yr)
120

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 0.08	Hexane 1.80	Toluene 3.40E-03
Potential to Emit (tons/yr)	1.26E-04	7.20E-05	4.50E-03	0.11	2.04E-04

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	3.00E-05	6.60E-05	8.40E-05	2.28E-05	1.26E-04

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-2, 1.4-3 and 1.4-4 (July, 1998). 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: Jack Cormack
Graphic Packaging International, Inc.
115 Koomler Dr
LaPorte, IN 46350

DATE: June 27, 2011

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

SUBJECT: Final Decision
MSOP - Renewal
091 - 30303 - 00099

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
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

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

June 27, 2011

TO: LaPorte Co Public Library LaPorte Branch

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

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

Applicant Name: Graphic Packaging International, Inc.
Permit Number: 091 - 30303 - 00099

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	LPOGOST 6/27/2011 Graphic Packaging International, Inc. 091 - 30303 - 00099 /final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: 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		Jack Cormack Graphic Packaging International, Inc. 115 Koomler Dr LaPorte IN 46350 (Source CAATS)										
2		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
3		LaPorte Co Public Library LaPorte Branch, 904 Indiana Ave. LaPorte IN 46350-4307 (Library)										
4		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)										
5		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
6		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)										
7		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 (Affected Party)										
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
9												
10												
11												
12												
13												
14												
15												

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