



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 1, 2011

RE: Printpack, Inc. / 105-30497-00046

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](http://www.idem.IN.gov)

Todd Wiederhold  
Printpack, Inc.  
2800 Overlook Pkwy  
Atlanta, GA 30339

August 1, 2011

Re: 105-30497-00046  
First Significant Revision to  
F105-28231-00046

Dear Todd Wiederhold:

Printpack, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. F105-28231-00046 on May 5, 2010 for a stationary flexible packaging rollstock and plastic bag manufacturing company located at 5550 W Vernal Pike, Bloomington, Indiana 47404. On April 29, 2011, the Office of Air Quality (OAQ) received an application from the source requesting to construct a new printing press (FP05), four (4) insignificant activities identified as BM emission units, a parts washer (PW01) and corrected description information. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Marcia Earl, of my staff, at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,

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

Attachments: Technical Support Document  
revised permit  
revised calculations

ACD/me

cc: File - Monroe County  
Monroe County Health Department

Printpack, Inc.  
Bloomington, Indiana  
Permit Reviewer: Marcia Earl

Page 2 of 2  
FESOP SPR No. 105-30497-00046

U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section  
IDEM Southeast Regional Office  
IDEM Southwest Regional Office



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Printpack, Inc.**  
**2121 N. Angelina Lane**  
**Bloomington, Indiana 47404**

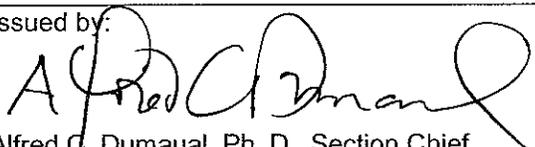
(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F105-28231-00046	
Original Issued by/Signed By:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 5, 2010  Expiration Date: May 5, 2015

First Significant Permit Revision No. 105-30497-00046	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2011  Expiration Date: May 5, 2015

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>11</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.7 Severability [326 IAC 2-8-4(4)]	
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14 Emergency Provisions [326 IAC 2-8-12]	
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.18 Permit Renewal [326 IAC 2-8-3(h)]	
B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.21 Source Modification Requirement [326 IAC 2-8-11.1]	
B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>21</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
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 2-8-4][326 IAC 2-8-5(a)(1)]**

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 27**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.1.1 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4] [326 IAC 2-2]

D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

D.1.5 Volatile Organic Compounds (VOC)

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

D.1.7 Thermal Oxidizer Temperature

D.1.8 Parametric Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

D.1.9 Record Keeping Requirements

D.1.10 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 31**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.2.1 Organic Solvent Degreasing Operations [326 IAC 8-3]

Certification Form ..... 32

Emergency Occurrence Form ..... 33

Quarterly Report Form ..... 35

Quarterly Deviation and Compliance Monitoring Report Form ..... 36

## 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 through A.3 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 2-8-3(b)]

---

The Permittee owns and operates a stationary flexible packaging rollstock and plastic bag manufacturing company.

Source Address:	2121 N. Angelina Lane, Bloomington, Indiana 47404
General Source Phone Number:	404-460-7553
SIC Code:	2673
County Location:	Monroe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

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

- (a) One (1) regenerative thermal oxidizer, identified as RTO1, approved for construction in 2010, with a maximum heat input rate of 16.5 MMBtu per hour, providing 98% control efficiency, using natural gas as primary fuel, using propane as secondary fuel, and venting to stack S01. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.
- (b) Two (2) solvent storage tanks, identified as TK01 and TK02, approved for construction in 2010, which are variable vapor space tanks located above ground, with a maximum storage capacity of 10,000 gallons, each, a maximum throughput of 1,040,000 gallons per year, each, and venting to stack S02 and S03, respectively.
- (c) Two (2) solvent storage tanks, identified as TK03 and TK04, approved for construction in 2010, which are variable vapor space tanks located above ground, with a maximum storage capacity of 5,000 gallons, each, a maximum throughput of 520,000 gallons per year, each, and venting to stack S02 and S03, respectively.
- (d) One (1) ink and solvent waste storage tank, identified as TK05, approved for construction in 2010, which is a variable vapor space tank located above ground, with a maximum storage capacity of 6,000 gallons, a maximum throughput of 624,000 gallons per year, using the regenerative thermal oxidizer (RTO1) as control.
- (e) One (1) photopolymer plate-making unit, identified as PH01, approved for construction in 2010, with a maximum capacity of 52.5 square foot per hour, housed in a permanent total enclosure, internally recycling spent solvent from the plate washout phase, using the regenerative thermal oxidizer (RTO1) as control.
- (f) Five (5) flexographic printing presses, identified as FP01, FP02, FP03, FP04, constructed in 2010, and FP05, approved for construction in 2011, using continuous web feed of

material, each using flexographic ink, with maximum line speeds of 2,000 feet per minute and maximum printing widths of 5.417 feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control.

- (g) Five (5) press drying ovens, identified as FD01, FD02, FD03, FD04, constructed in 2010, and FD05, approved for construction in 2011, each with a maximum heat input rate of 2.39 MMBtu per hour, using natural gas direct fire as primary fuel and propane as secondary fuel, each housed in a permanent total enclosure and operated under negative pressure, and using the regenerative thermal oxidizer (RTO1) as control. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

---

This stationary source also includes the following insignificant activities:

- (1) Activities or emission units, identified as BM01 through BM24, for which the potential uncontrolled emissions for PM10 are equal to or less than one (1) pound per day.
- (2) Water related activities
  - (A) Production of hot water for on-site personal use not related to any industrial or production process.
  - (B) Water treatment activities used to provide and process water for the plant, excluding any activities associated with wastewater treatment.
  - (C) Pressure washing of equipment.
- (3) Combustion activities
  - (A) Portable electrical generators that can be moved by hand from one location to another (without the assistance of motorized or non-motorized vehicle, conveyance, or device)
  - (B) Combustion emissions from propulsion of mobile sources
  - (C) Fuel use related to food preparation for on-site consumption
- (4) Activities related to ventilation, venting equipment and refrigeration
  - (A) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants.
  - (B) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste
  - (C) Natural gas pressure regulator vents, excluding venting at oil and gas production Facilities.
  - (D) Air vents from air compressors.

- (E) Vents for air cooling of electric motors provided the air does not commingle with regulated air pollutants.
- (5) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process
- (A) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways.
  - (B) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents.
  - (C) Brazing, soldering, or welding operations and associated equipment.
  - (D) Portable blast-cleaning equipment with enclosures.
  - (E) Batteries and battery charging stations, except at battery manufacturing plants.
  - (F) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
  - (G) Non-asbestos insulation installation or removal.
  - (H) Tarring, retarring and repair of building roofs.
  - (I) Instrument air dryer and filter maintenance.
  - (J) Manual tank gauging.
  - (K) Open tumblers associated with deburring operations in maintenance shops.
- (6) Activities performed using hand-held equipment
- (A) Application of hot melt adhesives with no VOC in the adhesive formulation.
  - (B) Cutting, excluding cutting torches.
  - (C) Machining wood, metal, or plastic.
  - (D) Turning wood, metal, or plastic.
  - (E) Buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface Grinding.
- (7) Housekeeping and janitorial activities and supplies
- (A) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both.
  - (B) Rest rooms and associated cleanup operations and supplies.
  - (C) Alkaline or phosphate cleaners and associated equipment.
  - (D) Mobile floor sweepers and floor scrubbers.

- (E) Pest control fumigation.
- (8) Office related activities
  - (A) Office supplies and equipment.
  - (B) Photocopying equipment and associated supplies.
  - (C) Paper shredding.
  - (D) Blueprint machines, photographic equipment, and associated supplies.
- (9) Lawn care and landscape maintenance activities and equipment, including the storage, spraying or application of insecticides, pesticides and herbicides
- (10) Storage equipment and activities
  - (A) Pressurized storage tanks and associated piping for liquid natural gas (LNG) (propane).
  - (B) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP.
  - (C) Storage of drums containing maintenance raw materials.
  - (D) Storage of any non-HAP containing material in solid form, stored in a sealed or covered container.
  - (E) Portable containers used for the collection, storage, or disposal of materials, where the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed, except when material is added or removed.
- (11) Emergency and standby equipment
  - (A) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares.
  - (B) Process safety relief devices installed solely for the purpose of minimizing injury to persons or damage to equipment which could result from abnormal process operating conditions, including the following: explosion relief vents, diaphragms or panels, rupture discs, or safety relief valves.
  - (C) Activities and equipment associated with on-site medical care not otherwise specifically regulated.
- (12) Sampling and testing equipment and activities used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
- (13) Use of consumer products and equipment where the product or equipment is used at a source in the same manner as normal consumer use and is not associated with any production process.
- (14) Activities generating limited amounts of fugitive dust

- (A) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(22)(B), and any required fugitive dust control plan or its equivalent is submitted.
  - (B) Road salting and sanding.
- (15) Activities associated with production
- (A) Closed, non-vented, tumblers used for cleaning or deburring metal products without abrasive blasting.
  - (B) Electrical resistance welding.
  - (C) Air compressors and pneumatically operated equipment, including hand tools.
  - (D) Compressor or pump lubrication and seal oil systems.
- (16) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities
- (A) Equipment used for surface coating, painting, dipping or spraying operation, except those that will emit VOCs or HAPs.
  - (B) Condensate drains for natural gas and landfill gas.
  - (C) Portable dust collectors.
  - (D) Manual loading and unloading operations.
  - (E) Purging of refrigeration devices using a combination of nitrogen and CFC-22 (R-22) as pressure test media.
  - (F) Construction and demolition operations.
  - (G) Mechanical equipment gear boxes and vents which are isolated from process Materials.
- (17) Combustion related activities
- (A) Space heaters, process heaters, or boilers using natural gas with a heat input rate equal to or less than ten million (10,000,000) Btu per hour, or using propane or liquefied petroleum gas, or butane-fired combustion with a heat input rate equal to or less than six million (6,000,000) Btu per hour.
  - (B) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu per hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu per hour.
- (18) VOC and HAP storage containers for the storage of hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (19) Production related activities

- (A) Application of the greases, lubricants, nonvolatile materials, and oils as temporary protective coatings.
  - (B) Machining where an aqueous cutting coolant continuously floods the machining Interface.
  - (C) Cleaners and solvents characterized as follows where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months:
    - (i) Having a vapor pressure equal to or less than two kilo Pascals (2.0 kPa) fifteen millimeters of mercury (15 mm Hg) or three-tenths pound per square inch (0.3 psi) measured at thirty-eight degrees Centigrade (38°C) (one hundred degrees Fahrenheit (100°F)).
    - (ii) Having a vapor pressure equal to or less than seven-tenths kilo Pascals (0.7 kPa) (five millimeters of mercury (5 mm Hg) or one-tenth pound per square inch (0.1 psi) measured at twenty degrees Centigrade (20°C) (sixty-eight degrees Fahrenheit (68°F)).
  - (D) Brazing equipment, cutting torches, soldering equipment, and welding equipment related to manufacturing activities not resulting in the emission of HAPs.
  - (E) Closed loop heating and cooling systems.
- (20) Water-based activities
- (A) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
  - (B) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
  - (C) Noncontact cooling tower systems with either of the following:
    - (i) Natural draft cooling towers not regulated under a NESHAP.
    - (ii) Forced and induced draft cooling tower systems not regulated under a NESHAP.
- (21) Repair activities
- (A) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - (B) Heat exchanger cleaning and repair.
  - (C) Process vessel degassing and cleaning to prepare for internal repairs.
- (22) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.
- (23) Paved and unpaved roads and parking lots with public access
- (24) Enclosed systems for conveying plastic raw materials and plastic finished goods.

- (25) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including purging of gas lines and purging of vessels.
- (26) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including tanks and catch tanks.
- (27) Blowdown for sigh glass, compressors, pumps, and cooling towers.
- (28) Activities associated with emergencies including on-site fire training approved by IDEM and stationary fire pump engines.
- (29) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths grains per actual cubic foot (0.03 gr/acf) and a gas flow rate less than or equal to four thousand actual cubic feet per minute (4,000 acf/min), including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (30) One (1) automatic parts washer with a remote solvent reservoir, identified as PW01, approved for construction in 2011, with a maximum capacity of 300 gallons, using a 50/50 wash and water solution and using less than 1,000 gallons per year of undiluted wash solution, or the equivalent that results in VOC emissions that are less than the threshold for an insignificant activity..

#### A.4 FESOP Applicability [326 IAC 2-8-2]

---

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

---

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 2-7) shall prevail.

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

---

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

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

---

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

### **B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

---

- (a) This permit, F105-28231-00046, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

### **B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

---

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

**B.7 Severability [326 IAC 2-8-4(4)]**

---

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

**B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

---

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

---

- (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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality,  
Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to F105-28231-00046 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

---

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

---

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 nine (9) months 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) 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.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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

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

---

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 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

- (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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

---

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

**C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
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) 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.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) regenerative thermal oxidizer, identified as RTO1, approved for construction in 2010, with a maximum heat input rate of 16.5 MMBtu per hour, providing 98% control efficiency, using natural gas as primary fuel, using propane as secondary fuel, and venting to stack S01. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.
- (b) Two (2) solvent storage tanks, identified as TK01 and TK02, approved for construction in 2010, which are variable vapor space tanks located above ground, with a maximum storage capacity of 10,000 gallons, each, a maximum throughput of 1,040,000 gallons per year, each, and venting to stack S02 and S03, respectively.
- (c) Two (2) solvent storage tanks, identified as TK03 and TK04, approved for construction in 2010, which are variable vapor space tanks located above ground, with a maximum storage capacity of 5,000 gallons, each, a maximum throughput of 520,000 gallons per year, each, and venting to stack S02 and S03, respectively.
- (d) One (1) ink and solvent waste storage tank, identified as TK05, approved for construction in 2010, which is a variable vapor space tank located above ground, with a maximum storage capacity of 6,000 gallons, a maximum throughput of 624,000 gallons per year, using the regenerative thermal oxidizer (RTO1) as control.
- (e) One (1) photopolymer plate-making unit, identified as PH01, approved for construction in 2010, with a maximum capacity of 52.5 square foot per hour, housed in a permanent total enclosure, internally recycling spent solvent from the plate washout phase, using the regenerative thermal oxidizer (RTO1) as control.
- (f) Five (5) flexographic printing presses, identified as FP01, FP02, FP03, FP04, constructed in 2010, and FP05, approved for construction in 2011, using continuous web feed of material, each using flexographic ink, with maximum line speeds of 2,000 feet per minute and maximum printing widths of 5.417 feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control.
- (g) Five (5) press drying ovens, identified as FD01, FD02, FD03, FD04, constructed in 2010, and FD05, approved for construction in 2011, each with a maximum heat input rate of 2.39 MMBtu per hour, using natural gas direct fire as primary fuel and propane as secondary fuel, each housed in a permanent total enclosure and operated under negative pressure, and using the regenerative thermal oxidizer (RTO1) as control. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

(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 2-8-4(1)]**

### **D.1.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-8-4] [326 IAC 2-2]**

---

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) the total VOC input to printing presses FP01, FP02, FP03, FP04 and FP05, and the photopolymer plate-making unit PH01 shall be limited to 4,777.10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) the overall VOC control efficiency (as the product of capture efficiency and destruction efficiency) for the regenerative thermal oxidizer (RTO1) shall be equal to or greater than ninety-eight percent (98%).

Compliance with these limits, combined with the VOC emissions from all other emission units at this source, shall limit the source-wide VOC emissions to less than one-hundred (100) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

### **D.1.2 Graphic Arts Operations [326 IAC 8-5-5]**

---

- (a) Pursuant to 326 IAC 8-5-5(e)(1)(C), the capture system for printing presses FP01 through FP05, in combination with the regenerative oxidation system (RTO1) shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the regenerative oxidation system (RTO1) for printing presses FP01 through FP05, shall maintain a minimum destruction efficiency of 90%.
- (c) Pursuant to 326 IAC 8-5-5(f), the Permittee shall use work practices to minimize VOC emissions from cleaning operations. Work practices shall include, but not be limited to, the following:
  - (1) When not in use, all cleaning materials shall be kept in closed containers.
  - (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

### **D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

---

A Preventive Maintenance Plan is required for the printing presses (FP01 through FP05), the photopolymer plate-making unit (PH01), and their respective 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.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

---

Compliance with the VOC input and emission limitations contained in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.5 Volatile Organic Compounds (VOC)

---

To order to comply with Conditions D.1.1(b), D.1.2(a), and D.1.2(b), the Permittee shall operate the capture system and regenerative thermal oxidizer (RTO1) and control VOC emissions from printing presses (FP01 through FP05) and the photopolymer plate-making unit (PH01) at all times that one (1) or more of the printing presses (FP01 through FP05) and/or the photopolymer plate-making unit (PH01) are in operation.

#### D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

---

In order to demonstrate compliance with Condition D.1.1(b), D.1.2(a), and D.1.2(b), the Permittee shall perform test of one (1) or more of the printing presses (FP01 through FP05) and the photopolymer plate-making unit (PH01) to verify the overall VOC control efficiency (as the product of capture efficiency and destruction efficiency) for the regenerative thermal oxidizer (RTO1), utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### D.1.7 Thermal Oxidizer Temperature

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer (RTO1) for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(b), D.1.2(a), and D.1.2(b).
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer so that the average operating temperature during any 3-hr period remains at or above the 3-hr average temperature observed during the compliant stack test performed most recently.

#### D.1.8 Parametric Monitoring

---

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(b), D.1.2(a), and D.1.2(b).
- (b) The duct pressure or AC frequency (Hz) of the variable frequency drive shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or AC frequency (Hz) of the variable frequency drive shall be maintained within the normal range as established during the compliant stack test performed most recently.
- (c) The Permittee shall take reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (d) The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

### **Record Keeping Requirements [326 IAC 2-8-4(3)]**

#### **D.1.9 Record Keeping Requirements**

---

- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1(a). 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, ink, and solvent used.
  - (2) The amount of coating material, ink, and solvent 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.
  - (3) The total VOC input for each month; and
  - (4) The total VOC input for each compliance period.
- (b) To document the compliance status with Conditions D.1.7, the Permittee shall maintain the continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (c) To document the compliance status with Conditions D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.10 Reporting Requirements**

---

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

- (30) One (1) automatic parts washer with a remote solvent reservoir, identified as PW01, approved for construction in 2011, with a maximum capacity of 300 gallons, using a 50/50 wash and water solution and using less than 1,000 gallons per year of undiluted wash solution, or the equivalent that results in VOC emissions that are less than the threshold for an insignificant activity.

(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 2-8-4(1)]

#### D.2.1 326 IAC 8-3 (Organic Solvent Degreasing Operations)

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

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Printpack, Inc.  
Source Address: 5550 W Vernal Pike, Bloomington, Indiana 47404  
FESOP Permit No.: F105-28231-00046

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Printpack, Inc.  
Source Address: 5550 W Vernal Pike, Bloomington, Indiana 47404  
FESOP Permit No.: F105-28231-00046

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Printpack, Inc.  
Source Address: 5550 W Vernal Pike, Bloomington, Indiana 47404  
FESOP Permit No.: F105-28231-00046  
Facility: Printing Presses FP01, FP02, FP03, FP04 and FP05 and the photopolymer plate-making unit PH01  
Parameter: Volatile Organic Compounds (VOC)  
Limit: The total VOC input to printing presses FP01, FP02, FP03, FP04 and FP05 and the photopolymer plate-making unit PH01 shall be limited to 4,756.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Printpack, Inc.  
Source Address: 5550 W Vernal Pike, Bloomington, Indiana 47404  
FESOP Permit No.: F105-28231-00046

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "no deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Addendum to the Technical Support Document (ATSD) for a  
Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>Printpack, Inc.</b>
<b>Source Location:</b>	<b>5550 W Vernal Pike, Bloomington, Indiana 47404</b>
<b>County:</b>	<b>Monroe</b>
<b>SIC Code:</b>	<b>2673</b>
<b>Operation Permit No.:</b>	<b>F 105-28231-00046</b>
<b>Operation Permit Issuance Date:</b>	<b>May 5, 2010</b>
<b>Significant Permit Revision No.:</b>	<b>105-30497-00046</b>
<b>Permit Reviewer:</b>	<b>Marcia Earl</b>

On June 17, 2011, the Office of Air Quality (OAQ) had a notice published in Herald Times, Bloomington, Indiana, stating that Printpack, Inc. had applied for a Significant Permit Revision to construct a new printing press, new BM emission units, and a parts washer to a stationary flexible packaging rollstock and plastic bag manufacturing company. The notice also stated that the OAQ proposed to issue a significant permit revision for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

<b>Comments and Responses</b>
-------------------------------

On July 19, 2011, Printpack, Inc submitted comments to IDEM, OAQ on the draft significant permit revision.

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

**Comment 1:**

Printpack requests that condition D.1.8 be revised to allow for duct pressure sensors to be calibrated or replaced at a frequency recommended by the manufacturer rather than specifying that it be done every six (6) months. Appropriate calibration frequencies are dependent on the type of duct sensor utilized and the conditions under which they are used.

**Response to Comment 1:**

IDEM agrees with the recommended changes, since calibrations and/or replacement frequencies are recommended by the manufacturer for the thermal oxidizer. The permit has been revised as follows:

...

#### D.1.8 Parametric Monitoring

---

...

- (d) The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months **or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.**

<b>Additional Changes</b>
---------------------------

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

- (a) Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). Therefore, CO<sub>2</sub>e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO<sub>2</sub>e per year (see ATSD Appendix A for detailed calculations). This did not require any changes to the permit.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed Significant Permit Revision can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

**Potential to Emit (tons/yr) - Unrestricted**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2E	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05) Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	16,752.28	0.00	0.00	0.00	0.17 Hexane
Parts Washer	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.00	0.00	0.00	0.00	0.00	0.81	0.00	0.00	0.00	
Press 1 Dryer (FD01)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.00	0.02	
Press 2 Dryer (FD02)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.00	0.02	
Press 3 Dryer (FD03)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.00	0.02	
Press 4 Dryer (FD04)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.00	0.02	
Press 5 Dryer (FD05)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.00	0.02	
RT01	0.549	0.549	0.549	0.043	7.23	0.40	6.07	0.00	0.14	
Insignificant Fuel Combustions	0.716	0.715	0.715	0.056	9.41	0.52	7.90	1,296	0.18	
<b>Totals</b>	<b>1.66</b>	<b>1.66</b>	<b>1.66</b>	<b>0.13</b>	<b>21.89</b>	<b>16,756.80</b>	<b>18.37</b>	<b>1,296</b>	<b>0.41</b>	

**Potential to Emit (tons/yr) - After Controls**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05) Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	335.05	0.00	0.00	0.00	0.17 Hexane
Parts Washer	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.00	0.00	0.00	0.00	0.00	0.81	0.00	0.00	0.00	
Press 1 Dryer (FD01)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 5 Dryer (FD05)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
RT01	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.00	0.003	
Insignificant Fuel Combustions	0.715	0.715	0.715	0.056	9.406	0.517	7.80	1,296	0.178	
<b>Totals</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.66</b>	<b>338.89</b>	<b>8.11</b>	<b>1,296</b>	<b>0.18</b>	

**Potential to Emit (tons/yr) - Limited and After Controls**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05) Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	0.00	0.17 Hexane
Parts Washer	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.00	0.00	0.00	0.00	0.00	0.815	0.00	0.00	0.00	
Press 1 Dryer (FD01)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
Press 5 Dryer (FD05)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	0.00	3.95E-04	
RT01	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.00	0.003	
Insignificant Fuel Combustions	0.715	0.715	0.715	0.056	9.406	0.517	7.90	1,296	0.178	
<b>Totals</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.65</b>	<b>99.38</b>	<b>8.11</b>	<b>1296.00</b>	<b>0.18</b>	

\* Using the Environmental Protection Agency's (EPA) TANKS Version 4.09d program, it was determined that use and storage of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

**Appendix A: Emissions Calculations  
 MAXIMUM EXPECTED EMISSION CALCULATIONS  
 FUEL COMBUSTION EMISSIONS  
 INSIGNIFICANT FUEL COMBUSTION SOURCES**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina Lane, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	1,288	0.02	0.02
Summed Potential Emissions in tons/yr	1,288		
CO2e Total in tons/yr	1,296		



**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

Unit	Burner Size (MMBtu/hr)
Air Handling Unit -1A	2.5
Air Handling Unit -1B	2.5
Air Handling Unit -1C	2.5
Air Handling Unit -1D	2.5
Air Handling Unit -2A	2.5
Air Handling Unit -2B	2.5
Air Handling Unit -2C	2.5
Air Handling Unit -3	0.25
Air Handling Unit -4	0.875
Air Handling Unit -5	0.02
Air Handling Unit -6	0.25
Air Handling Unit -7	0.15
Air Handling Unit -8	0.15
ERU-1	1.25
MUA-1	0.07
Air Recirculation Unit -1	0.1
Air Recirculation Unit -2	0.1
Water Heater -1	0.285
Water Heater -2	0.237
Water Heater -3	0.237
<b>Total</b>	<b>21.474</b>

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Printpack, Inc.  
**Source Location:** 2121 N. Angelina Lane, Bloomington, Indiana 47404  
**County:** Monroe  
**SIC Code:** 2673  
**Operation Permit No.:** F 105-28231-00046  
**Operation Permit Issuance Date:** May 5, 2010  
**Significant Permit Revision No.:** 105-30497-00046  
**Permit Reviewer:** Marcia Earl

On April 29, 2011, the Office of Air Quality (OAQ) received an application from Printpack, Inc. related to a modification to an existing stationary flexible packaging rollstock and plastic bag manufacturing company.

**Source Definition**

Printpack, Inc. has an existing plant at 303 North Curry Pike, Bloomington, Indiana 47404 under permit number F105-28231-00046 and an existing plant at 2121 N. Angelina Lane, Bloomington, Indiana 47404. The two (2) plants are on separate properties, approximately 2 miles apart. Pursuant to FESOP No. F105-28231-00046, issued on May 5, 2010, IDEM has examined whether the two (2) plants are part of the same major source. IDEM has determined that since the two (2) plants do not meet all three parts of the major source definition that the two (2) plants are not the same major source.

**Existing Approvals**

The source was issued FESOP No. F105-28231-00046 on May 5, 2010.

**County Attainment Status**

The source is located in Monroe County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when

evaluating the rule applicability relating to ozone. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 Monroe County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
 Monroe County has been classified as attainment or unclassifiable in Indiana for all 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, Emission Offset, and Part 70 Permit applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								Worst Single HAP
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	
Printing Presses (FP01 through FP04)	0.00	0.00	0.00	0.00	0.00	98.12	0.00	0.00	0.17 Hexane
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	0.41	0.00	0.00	
Storage Tanks (TK-1 through TK05 and RT01)*	0.00	0.00	0.00	0.00	0.00	0.815	0.00	0.00	
Press 1 Dryer (FD01)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
RTO1	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.003	
Insignificant Fuel Combustion	0.715	0.715	0.715	0.056	9.406	0.517	7.90	0.178	

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
<b>Total PTE of Entire Source</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.63</b>	<b>99.88</b>	<b>8.09</b>	<b>0.18</b>	<b>0.17 Hexane</b>
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									
These emissions are based upon FESOP permit F105-28231-00046, issued May 5, 2010									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source accepted limits on VOC emission to less than 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The following is a list of the new emission units:

- (a) One (1) flexographic printing press, identified as FP05, approved for construction in 2011, using continuous web feed of material, using flexographic ink, with maximum line speed of 2,000 feet per minute and maximum printing widths of 5,417 feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control;
- (b) One (1) automatic parts washer, identified as PW01, approved for construction in 2011, with a maximum capacity of 300 gallons, using a 50/50 wash and water solution and using less than 1,000 gallons per year.

**Insignificant Activities**

- (c) Four (4) BM units, identified as BM21 through BM24, approved for construction in 2011, for which combined with the 20 other BM units the potential uncontrolled emissions for PM10 are equal to or less than one (1) pound per day.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

- (a) See Appendix A of this TSD for detailed emission calculations.
- (b) Using the Environmental Protection Agency's (EPA) TANKS Version 4.9d program, it was determined that use and storage of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Printing Press (FP05)	0.00	0.00	0.00	0.00	0.00	3,342.0	0.00	0.00	0.00
Press 5 Dryer (FD05)	0.080	0.080	0.080	6.28E-03	1.047	0.058	0.879	0.020	3.77E-04 Hexane
Parts Washer (PW01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00
Insignificant Activities (BM01 through BM24)	<1.00	<1.00	<1.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Proposed Revision</b>	<b>1.08</b>	<b>1.08</b>	<b>1.08</b>	<b>6.28E-03</b>	<b>1.047</b>	<b>3,344.6</b>	<b>0.879</b>	<b>0.020</b>	<b>3.77E-04 Hexane</b>
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".									

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Printing Presses (FP01 through FP04-5) <b>Photopolymer Plate-Making Unit (PH01)</b>	0.00	0.00	0.00	0.00	0.00	<del>98.12</del> <b>95.54</b>	0.00	0.00	0.00
<del>Photopolymer Plate-Making Unit (PH01)</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>	<del>0.44</del>	<del>0.00</del>	<del>0.00</del>	
Storage Tanks (TK-1 through TK05 and RT01)	0.00	0.00	0.00	0.00	0.00	0.815	0.00	0.00	0.00
<b>Parts Washer (PW01)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2.49</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Press 1 Dryer (FD01)	0.00	0.00	0.00	0.00	0.00	0.001	0.00	0.00	<b>0.17 4.98E-03 Hexane</b>
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
<b>Press 5 Dryer (FD05)</b>	<b>0.002</b>	<b>0.002</b>	<b>0.002</b>	<b>1.26E-04</b>	<b>0.021</b>	<b>0.001</b>	<b>0.02</b>	<b>3.95E-04</b>	
RTO1	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.003	
Insignificant Fuel Combustion	0.715	0.715	0.715	0.056	9.406	0.517	7.90	0.178	0.17 Hexane
Total PTE of Entire Source	0.73	0.73	0.73	0.06	<del>9.65</del>	<del>99.88</del> <b>99.38</b>	<del>7.90</del> <b>8.11</b>	0.18	0.17 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".									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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 Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Printing Presses (FP01 through FP05) Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	0.00
Storage Tanks (TK-1 through TK05 and RT01)	0.00	0.00	0.00	0.00	0.00	0.815	0.00	0.00	0.00
Parts Washer (PW01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00
Press 1 Dryer (FD01)	0.00	0.00	0.00	0.00	0.00	0.001	0.00	0.00	4.98E-03 Hexane
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 5 Dryer (FD05)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
RTO1	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.003	
Insignificant Fuel Combustion	0.715	0.715	0.715	0.056	9.406	0.517	7.90	0.178	0.17 Hexane
<b>Total PTE of Entire Source</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.65</b>	<b>99.38</b>	<b>8.11</b>	<b>0.18</b>	<b>0.17 Hexane</b>
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) FESOP Status and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) Applicability  
 This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) the total VOC input to printing presses FP01, FP02, FP03, FP04 and FP05, and the photopolymer plate-making unit PH01 shall be limited to 4,756.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. and
- (2) the overall VOC control efficiency (as the product of capture efficiency and destruction efficiency) for the regenerative thermal oxidizer (RTO1) shall be equal to or greater than

ninety-eight percent (98%).

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This revision to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

<b>Federal Rule Applicability Determination</b>
---

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements for the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, 40 CFR 63, Subpart S, (63.440 to 63.459) (326 IAC 20-33), are not included in this permit, because this source does not produce pulp, paper, or paperboard and is not a major source of HAPs.
- (c) The requirements for the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 to 63.471) (326 IAC 20-6), are not included in this permit, because the source does not use halogenated solvents at this facility.
- (d) The requirements for the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (63.820 to 63.839) (326 IAC 20-18), are not included in this permit, because this source is not a major source of HAP's.
- (e) The requirements for the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coatings, 40 CFR 63, Subpart JJJJ (63.3280 to 63.3420) (326 IAC 20-65), are not included in this permit, because this source is not a major source of HAP's.
- (f) The requirements for the National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO (63.4280 to 63.4371) (326 IAC 20-77), are not included in this permit, because this source does not include fabric and other textiles printing, coating and dyeing operations and this source is not a major source of HAP's.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

**State Rule Applicability Determination**

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 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 this permit:
  - (1) 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.
  - (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
This source is not subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), since it is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne County.
- (h) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)  
This rule applies to sources as of January 1, 1980, located in Lake and Marion Counties, with potential emissions of 90.7 megagrams (100 tons) or greater per year of VOC, not limited by other rules in Article 8 and/or source commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state, with potential emission of 90.7 megagrams (100 tons) or greater per year of VOC, not limited by other rules in Article 8. This source commenced operation in 2010 in Monroe County and is subject to 326 IAC 8-5-5. Therefore, 326 IAC 8-6-1 is not applicable to this source.

Printing Presses (FP01 through FP05)

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

The printing presses (FP01 through FP05) are not subject to 326 IAC 6-3-2, because the printing presses are not sources of particulate emission.

- (j) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
This rule is applicable to VOC emission units that were constructed after January 1, 1980, that have potential emission greater than 25 tons per year, and are not otherwise regulated by other provisions of Article 8. The flexographic printing presses, identified as FP01 through FP05, are not subject to the provisions of 326 IAC 8-1-6, because they are subject to the provisions of 326 IAC 8-5-5.
- (k) 326 IAC 8-2-5 (Paper Coating Operations)  
This source is not subject to 326 IAC 8-2-5 (Paper Coating Operations), because the printing presses (FP01 through FP05) are subject to the provisions of 326 IAC 8-5-5.
- (l) 326 IAC 8-5-5 (Graphic Arts Operations)  
The flexographic printing presses, identified as FP01 through FP05, are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because they were constructed after November 1, 1980, and the entire source has potential VOC emissions greater than 25 tons per year.
- (1) Pursuant to 326 IAC 8-5-5(e)(1)(C), the capture system for the printing presses (FP01 through FP05) in combination with the regenerative oxidation system (RT01) shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (2) Pursuant to 326 IAC 8-5-5(c)(3)(B), the regenerative oxidation system (RT01) for the printing presses (FP01 through FP05), shall maintain a minimum destruction efficiency of 90%. The regenerative thermal oxidizer (RT01) shall be in operation at all times these printing presses are in operation, in order to comply with this limit.
- (3) Pursuant to 326 IAC 8-5-5(f), the Permittee shall use work practices to minimize VOC emissions from cleaning operations. Work practices shall include, but not be limited to, the following:
- (1) When not in use, all cleaning materials shall be kept in closed containers.
- (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

Regenerative Oxidation System (RT01) and Drying Ovens (FD01 through FD05)

- (m) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The one (1) regenerative thermal oxidizer (RT01) and the five (5) drying ovens (FD01 through FD05) are not subject to 326 IAC 6-2 because they are not sources of indirect heating.
- (n) 326 IAC 7-1.1-1 (Sulfur Dioxide Emissions Limitations)  
The one (1) regenerative thermal oxidizer (RT01) is not subject to 326 IAC 7-1.1 because the potential to emit SO<sub>2</sub> from the RT01 is less than twenty-five (25) tons per year and less than ten (10) pound per hour.

Part Washer (PW01)

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

- (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
  - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (p) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (q) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Thermal Oxidizer Temperature

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer (RT01) for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average, from the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1,400°F.
- (2) The Permittee shall determine the 30 hour average temperature from the most recent valid stack test that demonstrates compliance.
- (3) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

Thermal Oxidizer Parametric Monitoring

- (4) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance.
- (5) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

- (b) The testing requirements applicable to this proposed revision are as follows:

- (1) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up of one (1) or more of the printing presses (FP01 through FP05) and the photopolymer plate-making unit (PH01), the Permittee shall conduct a performance test to

verify the overall VOC control efficiency (as the product of capture efficiency and destruction efficiency) for the regenerative thermal oxidizer (RT01) utilizing methods as approved by the Commissioner. The test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

- (2) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up of one (1) or more of the printing presses (FP01 through FP05) and the photopolymer plate-making unit (PH01), the Permittee shall conduct a performance test to verify the VOC destruction efficiency for the regenerative thermal oxidizer (RT01) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

<b>Proposed Changes</b>
-------------------------

- (a) The following changes listed below are due to the proposed revision along with corrections of typographical errors from FESOP No. F105-28231-00046, issued May 5, 2010. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (b) The proposed revision does not change the permit level and additional requirements being added to the permit, will appear as bolded text.
- (c) The United States Postal Service has made a change in the physical address of this source.
- (d) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Printpack, Inc.  
~~5550 W Vernal Pike~~  
**2121 N. Angelina Lane**  
Bloomington, Indiana 47404

### ...SECTION A SOURCE SUMMARY

...  
A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary flexible packaging rollstock and plastic bag manufacturing company.

Source Address: ~~5550 W Vernal Pike~~ **2121 N. Angelina Lane,**  
Bloomington, Indiana 47404

Mailing Address: ~~PO Box 723608, Atlanta, GA 47404~~

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

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

- (a) One (1) regenerative thermal oxidizer, identified as RTO1, approved for construction in 2010, with a maximum heat input rate of ~~20.3~~ **16.5** MMBtu per hour, providing 98%

control efficiency, using natural gas as primary fuel, using propane as secondary fuel, and venting to stack S01. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

...

- (f) ~~Four (4)~~ **Five (5)** flexographic printing presses, identified as FP01, FP02, FP03, and FP04, **constructed in 2010, and FP05, approved for construction in 2011**, using continuous web feed of material, ~~approved for construction in 2010~~, each using flexographic ink, with maximum line speeds of 2,000 feet per minute and maximum printing widths of ~~5.412~~ **5.417** feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control. ~~Under 40 CFR 63, Subpart KK, this unit is considered an affected source/facility. [40 CFR 63, Subpart KK] [326 IAC 20-18]~~

- (g) ~~Four (4)~~ **Five (5)** press drying ovens, identified as FD01, FD02, FD03, and FP04, **constructed in 2010, and FD05, approved for construction in 2011**, ~~approved for construction~~, each with a maximum heat input rate of ~~4.66~~ **2.39** MMBtu per hour, using natural gas direct fire as primary fuel and propane as secondary fuel, each housed in a permanent total enclosure and operated under negative pressure, and using the regenerative thermal oxidizer (RTO1) as control. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (1) Activities or emission units, identified as BM01 through ~~BM20~~ **BM24**, for which the potential uncontrolled emissions for PM10 are equal to or less than one (1) pound per day.

...

- (D) Portable blast-cleaning equipment with enclosures, ~~identified as PW01~~.

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) One (1) regenerative thermal oxidizer, identified as RTO1, approved for construction in 2010, with a maximum heat input rate of ~~20.3~~ **16.5** MMBtu per hour, providing 98% control efficiency, using natural gas as primary fuel, using propane as secondary fuel, and venting to stack S01. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

...

- (f) ~~Four (4)~~ **Five (5)** flexographic printing presses, identified as FP01, FP02, FP03, and FP04, **constructed in 2010 and FP05, approved for construction in 2011**, using continuous web feed of material, ~~approved for construction in 2010~~, each using flexographic ink, with maximum line speeds of 2,000 feet per minute and maximum printing widths of ~~5.412~~ **5.417** feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control. ~~Under 40 CFR 63, Subpart KK, this unit is considered an affected source/facility. [40 CFR 63, Subpart KK] [326 IAC 20-18]~~

- (g) ~~Four (4)~~ **Five (5)** press drying ovens, identified as FD01, FD02, FD03, and FD04, **constructed**

**in 2010, and FD05, approved for construction in 2011, approved for construction in 2010,** each with a maximum heat input rate of ~~4.66~~ **2.39** MMBtu per hour, using natural gas direct fire as primary fuel and propane as secondary fuel, each housed in a permanent total enclosure and operated under negative pressure, and using the regenerative thermal oxidizer (RTO1) as control. Propane will only be used as an emergency backup fuel in the event of an interruption in natural gas service.

(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 2-8-4(1)]

#### D.1.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) the total VOC input to printing presses FP01, FP02, FP03, ~~and~~ FP04, **and FP05** and the photopolymer plate-making unit PH01 shall be limited to ~~4,926.4~~ **4,756.52** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

#### D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)~~(3)~~**(1)(C)**, the capture system for printing presses FP01 through ~~FP04~~ **FP05**, in combination with the regenerative oxidation system (RTO1) shall be operated in such a manner to achieve a minimum of sixty percent (60%) overall control efficiency.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the regenerative oxidation system (RTO1) for printing presses FP01 through ~~FP04~~ **FP05**, shall maintain a minimum destruction efficiency of 90%.
- (c) **Pursuant to 326 IAC 8-5-5(f), the Permittee shall use work practices to minimize VOC emissions from cleaning operations. Work practices shall include, but not be limited to, the following:**
  - (1) **When not in use, all cleaning materials shall be kept in closed containers.**
  - (2) **Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.**

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the printing presses (FP01 through ~~FP04~~ **FP05**), the photopolymer plate-making unit (PH01), and their respective 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.1.5 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.1.1(b), **D.1.2(a)**, and D.1.2(b), the Permittee shall operate the capture system and regenerative thermal oxidizer (RTO1) and control VOC emissions from printing presses (FP01 through ~~FP04~~ **FP05**) and the photopolymer plate-making unit (PH01) at all times that one (1) or more of the printing presses (FP01 through ~~FP04~~ **FP05**) and/or the photopolymer plate-making unit (PH01) are in operation.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1(b), **D.1.2(a)**, and **D.1.2(b)**, the Permittee shall comply with the following:

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up of one (1) or more of the printing presses (FP01 through ~~FP04~~ **FP05**) and the photopolymer plate-making unit (PH01), the Permittee shall conduct a performance test to verify the overall VOC control efficiency (as the product of capture efficiency and destruction efficiency) for the regenerative thermal oxidizer (RTO1), utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

...  
D.1.7 Thermal Oxidizer Temperature

- ...
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(b), **D.1.2(a)**, and **D.1.2(b)**.
  - (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer **so that the average operating** ~~at or above the 3-hour average~~ temperature **during any 3-hr period remains at or above the 3-hr average temperature** observed during the compliant stack test **performed most recently**.

D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(b), **D.1.2(a)**, and **D.1.2(b)**.
- (b) The duct pressure or **AC frequency (Hz) of the variable frequency drive fan amperage** shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or **AC frequency (Hz) fan amperage of the variable frequency drive** shall be maintained within the normal range as established **during the** ~~in most recent~~ compliant stack test **performed most recently**.

...

SECTION E.1 EMISSION UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (f) ~~Four (4)~~ **Five (5)** flexographic printing presses, identified as FP01, FP02, FP03, ~~and~~ FP04, **constructed in 2010, and FP05, approved for construction in 2011**, using continuous web feed of material, ~~approved for construction in 2010~~, each using flexographic ink, with maximum line speeds of 2,000 feet per minute and maximum printing widths of ~~5.412~~ **5.417** feet, using web as the feed type, housed in a permanent total enclosure, using the regenerative thermal oxidizer (RTO1) as control. ~~Under 40 CFR 63, Subpart KK, this unit is considered an affected source/facility. [40 CFR 63, Subpart KK] [326 IAC 20-18]~~

(The information describing the process contained in this facility description box is descriptive information)

and does not constitute enforceable conditions.)

...

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION

Source Name: Printpack, Inc.  
Source Address: ~~5550 W Vernal Pike~~ **2121 N. Angelina Lane**, Bloomington, Indiana 47404  
Mailing Address: ~~PO Box 723608, Atlanta, GA 47404~~  
FESOP Permit No.: F105-28231-00046

...

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

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT

Source Name: Printpack, Inc.  
Source Address: ~~5550 W Vernal Pike~~ **2121 N. Angelina Lane**, Bloomington, Indiana 47404  
Mailing Address: ~~PO Box 723608, Atlanta, GA 47404~~  
FESOP Permit No.: F105-28231-00046

...

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

FESOP Quarterly Report

Source Name: Printpack, Inc.  
Source Address: ~~5550 W Vernal Pike~~ **2121 N. Angelina Lane**, Bloomington, Indiana 47404  
Mailing Address: ~~PO Box 723608, Atlanta, GA 47404~~  
FESOP Permit No.: F105-28231-00046  
Facility: Printing Presses FP01, FP02, FP03, ~~and FP04~~ **and FP05**, and the photopolymer plate-making unit PH01  
Parameter: Volatile Organic Compounds (VOC)  
Limit: The total VOC input to printing presses FP01, FP02, FP03, ~~and FP04~~ **and FP05**, and the photopolymer plate-making unit PH01 shall be limited to ~~4,926.4~~ **4,756.52** tons per twelve (12) consecutive month period, with compliance determined at the end of each month

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Printpack, Inc.  
Source Address: 5550 W Vernal Pike, Bloomington, Indiana 47404  
~~Mailing Address: PO Box 723608, Atlanta, GA 47404~~  
FESOP Permit No.: F105-28231-00046

...

**Conclusion and Recommendation**

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 April 29, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 105-30497-00046. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

**Potential to Emit (tons/yr) - Unrestricted**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05)	0.00	0.00	0.00	0.00	0.00	16,752.28	0.00	0.00	0.17 Hexane
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	
Parts Washer	0.00	0.00	0.00	0.00	0.00	0.81	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.02	
Press 1 Dryer (FD01)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.02	
Press 2 Dryer (FD02)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.02	
Press 3 Dryer (FD03)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.02	
Press 4 Dryer (FD04)	0.080	0.080	0.080	0.006	1.05	0.06	0.88	0.02	
Press 5 Dryer (FD05)	0.549	0.549	0.549	0.043	7.23	0.40	6.07	0.14	
RTO1	0.715	0.715	0.715	0.056	9.41	0.52	7.90	0.18	
Insignificant Fuel Combustions									
<b>Totals</b>	<b>1.66</b>	<b>1.66</b>	<b>1.66</b>	<b>0.13</b>	<b>21.87</b>	<b>16,756.79</b>	<b>18.37</b>	<b>0.41</b>	

**Potential to Emit (tons/yr) - After Controls**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05)	0.00	0.00	0.00	0.00	0.00	335.05	0.00	0.00	Hexane 0.17
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	
Parts Washer	0.00	0.00	0.00	0.00	0.00	0.81	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 1 Dryer (FD01)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 5 Dryer (FD05)	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.003	
RTO1	0.715	0.715	0.715	0.056	9.406	0.517	7.90	0.178	
Insignificant Fuel Combustions									
<b>Totals</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.65</b>	<b>338.89</b>	<b>8.11</b>	<b>0.18</b>	

**Potential to Emit (tons/yr) - Limited and After Controls**

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Single Highest HAP
Printing Presses (FP01 through FP05)	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	Hexane 0.17
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	
Parts Washer	0.00	0.00	0.00	0.00	0.00	0.815	0.00	0.00	
Storage Tanks (TK01-TK05, RT01) *	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 1 Dryer (FD01)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 2 Dryer (FD02)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 3 Dryer (FD03)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 4 Dryer (FD04)	0.002	0.002	0.002	1.26E-04	0.021	0.001	0.02	3.95E-04	
Press 5 Dryer (FD05)	0.011	0.011	0.011	0.001	0.145	0.008	0.12	0.003	
RTO1	0.715	0.715	0.715	0.056	9.406	0.517	7.90	0.178	
Insignificant Fuel Combustions									
<b>Totals</b>	<b>0.73</b>	<b>0.73</b>	<b>0.73</b>	<b>0.06</b>	<b>9.65</b>	<b>99.38</b>	<b>8.11</b>	<b>0.18</b>	

\* Using the Environmental Protection Agency's (EPA) TANKS Version 4.09d program, it was determined that use and storage of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

**Appendix A: Emissions Calculations  
FIVE (5) PRINTING PRESS EMISSION CALCULATIONS**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina Lane, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

**Potential Emissions**

8,760 hrs/yr  
 2,000 ft/min  
 1,051,200,000 ft/yr  
 65 max web width (in)  
 5,694,000,000 sq ft/yr  
 3,000 sq ft/ream  
 1,898,000 reams/yr

**VOC Usage**

1.50 lbs ink solids/ream  
 2.33 lbs VOC/lbs ink solids  
 1,898,000 reams/yr  
 6,643,000 lbs VOC/yr  
 3,321.50 tons VOC/yr

**Clean Up**

0.5 gal/deck/changeover  
 10 decks  
 3 changeovers/day  
 365 days/yr  
 7.6 lbs/gal  
 41,610 lbs/yr  
 20.81 tons/yr

**Press Total (one (1) press)**

6,684,610 lbs VOC usage/yr  
 763 lbs VOC usage/hr  
 3,342 tons VOC usage/yr PTE before controls  
 98.0% Total Control Efficiency  
 66.85 ton VOC emissions/yr PTE after controls

16,711.53 tpy of VOC for all 5 press before controls  
**334.23 tpy of VOC for all 5 press after controls**

**Limited Emissions**

4,750 hrs/yr  
 1,550 ft/min  
 441,750,000 ft/yr  
 65 max web width (in)  
 2,392,812,500 sq ft/yr  
 3,000 sq ft/ream  
 797,604 reams/yr

**VOC Usage**

1.00 lbs ink solids/ream  
 2.33 lbs VOC/lbs ink solids  
 797,604 reams/yr  
 1,861,076 lbs VOC/yr  
 930.54 tons VOC/yr

**Clean Up**

0.5 gal/deck/changeover  
 10 decks  
 3 changeovers/day  
 365 days/yr  
 7.6 lbs/gal  
 41,610 lbs/yr  
 20.81 tons/yr

**Press Total (one (1) press)**

1,902,686 lbs VOC usage/yr  
 401 lbs VOC usage/hr  
 951 tons VOC usage/yr limited - before controls\*  
 98.0% Total Control Efficiency  
 19.03 ton VOC emissions/yr limited - after controls

4,756.72 tpy of VOC for all 5 presses limited before controls  
**95.13 tpy of VOC for all 5 presses limited after controls**

\*This limit is used to limit VOC emissions to be < 100 tpy source-wide.

VOC usage = [(lbs ink solids/ream)\*(lbs VOC/lbs ink solids)\*(reams/yr)]/2000

Clean Up = [(gal/deck/changeover)\*(decks)\*(changeovers/day)\*(days/yr)\*(gal/yr)\*(lbs/yr)]/2000

lbs VOC usage/yr press total for 1 press = VOC Usage lbs VOC/yr + Clean Up lbs/yr)

potential lbs VOC usage/hr press total for 1 press = [(lbs VOC usage/yr for 1 press) / (8760 hrs/yr)

limited lbs VOC usage/hr press total for 1 press = [(lbs VOC usage/yr for 1 press) / (6000 hrs/yr)

tons VOC usage/yr limited before controls press total for 1 press = (VOC Usage tons VOC/yr) + (Clean Up tons/yr)

ton VOC emissions/yr limited after controls press total for 1 press = (tons VOC usage/yr limited before controls)\*(1-0.98)

ton VOC emissions/yr limited after controls press total for 5 presses = [(tons VOC usage/yr limited before controls)\*(1-0.98)]\*5

**Appendix A: Emissions Calculations  
PHOTOPOLYMER PLATEMAKER EMISSION CALCULATIONS**

**Company Name: Printpack, Inc.  
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404  
Permit Number: F105-30497-00046  
Reviewer: Marcia Earl  
Date: April 2011**

**Potential Emissions**

8,760 hrs/yr  
17.50 ft<sup>2</sup>/plate  
3 plates/hr  
459,900 ft<sup>2</sup>/yr  
**VOC Usage**  
7.09 lbs VOC/gal of washout solution  
0.25 gal of washout solution/ft<sup>2</sup> of plate material  
10% evaporation rate (90% recycled internally)

**Photopolymer Total**

81,517 lbs VOC usage/yr  
3.1 lbs VOC usage/plate  
40.76 tons VOC usage/yr PTE before controls  
98.0% Total Control Efficiency  
**0.82 ton VOC emissions/yr PTE after controls**

**Limited Emissions**

4,380 hrs/yr  
17.50 ft<sup>2</sup>/plate  
3 plates/hr  
229,950 ft<sup>2</sup>/yr  
**VOC Usage**  
7.09 lbs VOC/gal of washout solution  
0.25 gal of washout solution/ft<sup>2</sup> of plate material  
10% evaporation rate (90% recycled internally)

**Photopolymer Total**

40,759 lbs VOC usage/yr (total usage)  
3.1 lbs VOC usage/plate  
20.38 tons VOC usage/yr limited - before controls (evaporated)\*  
98.0% Total Control Efficiency  
**0.41 ton VOC emissions/yr limited - after controls (evaporated)**

\*This limit is used to limit VOC emissions to be < 100 tpy source-wide.

$$\text{ft}^2/\text{yr} = (\text{hrs/yr}) * (\text{ft}^2/\text{plate}) * (\text{plates/hr})$$

$$\text{Photopolymer Total lbs VOC usage/yr} = [(\text{ft}^2/\text{yr}) * (\text{VOC Usage lbs VOC/gal washout solution}) *$$

$$(\text{VOV Usage gal washout solution/ft}^2 \text{ of plate material}) * (\text{VOC Usage evaporation rate})]$$

$$\text{Photopolymer Total tons VOC usage/yr limited before controls (evaporated)} = (\text{Photopolymer Total lbs VOC usage/yr}) / 2000$$

$$\text{Photopolymer Total tons VOC usage/yr limited after controls (evaporated)} = [(\text{Photopolymer Total tons VOC usage/yr limited before controls (evaporated)}) * (1 - 0.98)]$$

**Appendix A: Emissions Calculations  
PARTS WASHER**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina Lane, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

**POTENTIAL EMISSIONS**

Wash Solution Tank	300 gallons
Solution Life	8 weeks
Dilution in Tank	0.05 50/50 Wash Solution and Water
Wash Solution Per Year	975 gallons
VOC in wash Solution	55.00%
VOC Per Year	536.25 gallons
VOC Density	9.3 lbs/gal
VOC Emission	4987.10 lbs/yr
	2.49 tons/yr

**METHODOLOGY**

Wash Solution Per Year = tank (gals) / Solution ratio 50/50 (2) \* Solution Life (year) (6.5) (times solution is changed per year).  
VOC Per Year = Wash Solution Per year (gal) \* VOC in Wash Solution  
VOC Emission( lbs/yr) = VOC Per Year \* VOC Density  
VOC Emission (tons/yr) = VOC emissions in lbs/yr / 1 ton/2000 lbs.

**Appendix A: Emissions Calculations  
 MAXIMUM EXPECTED EMISSION CALCULATIONS  
 FUEL COMBUSTION EMISSIONS  
 FLEXOGRAPHIC PRESS NO. 1 (FP01)**

Company Name: Printpack, Inc.  
 Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404  
 Permit Number: F105-30497-00046  
 Reviewer: Marcia Earl  
 Date: April 2011

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	115.15	0.058	2.30	0.001
NOx	100	2,093.64	1.047	41.87	0.021
CO	84	1,758.66	0.879	35.17	0.018
SO <sub>2</sub>	0.6	12.56	6.28E-03	0.25	1.26E-04
PM/PM10/PM2.5	7.6	159.12	0.080	3.18	0.002
Total HAPs	1.89E+00	39.54	0.020	0.79	3.95E-04
Arsenic	2.00E-04	4.19E-03	2.09E-06	8.37E-05	4.19E-08
Beryllium	1.20E-05	2.51E-04	1.26E-07	5.02E-06	2.51E-09
Cadmium	1.10E-03	0.02	1.15E-05	0.00	2.30E-07
Chromium	1.40E-03	0.03	1.47E-05	0.00	2.93E-07
Cobalt	8.40E-05	1.76E-03	8.79E-07	3.52E-05	1.76E-08
Lead	5.00E-04	1.05E-02	5.23E-06	2.09E-04	1.05E-07
Manganese	3.80E-04	7.96E-03	3.98E-06	1.59E-04	7.96E-08
Mercury	2.60E-04	5.44E-03	2.72E-06	1.09E-04	5.44E-08
Nickel	2.10E-03	0.04	2.20E-05	0.00	4.40E-07
Selenium	2.40E-05	5.02E-04	2.51E-07	1.00E-05	5.02E-09
Benzene	2.10E-03	0.04	2.20E-05	0.00	4.40E-07
Dichlorobenzene	1.20E-03	0.03	1.26E-05	0.00	2.51E-07
Formaldehyde	7.50E-02	1.57	7.85E-04	0.03	1.57E-05
Hexane <sup>(4)</sup>	1.80E+00	37.69	1.88E-02	0.75	3.77E-04
Naphthalene	6.10E-04	1.28E-02	6.39E-06	2.55E-04	1.28E-07
Toluene	3.40E-03	0.07	3.56E-05	0.00	7.12E-07
POM	8.82E-05	1.85E-03	9.23E-07	3.69E-05	1.85E-08

- (1) Based on maximum fuel requirements to operate dryers:  
 2.39 Total Max Burner Capacity (MMBtu/hr)  
 8,760 hr/yr  
 20,936 Annual MMBtu requirement = [Total Max Burner Capacity (MMBtu/hr) \* (hr/yr)]  
 1,000 Btu/ft<sup>3</sup>  
 20,936,400 ft<sup>3</sup>/yr of Natural Gas required per year = [(Annual MMBtu requirement)\*(1,000,000)/(1,000)]
- (2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.
- (3) VOC emissions from press dryer fuel combustion will be controlled by RTO1 at a  
 98.0% VOC Control Efficiency
- (4) Single Highest HAP.

**Appendix A: Emissions Calculations**  
**MAXIMUM EXPECTED EMISSION CALCULATIONS**  
**FUEL COMBUSTION EMISSIONS**  
**FLEXOGRAPHIC PRESS NO. 2 (FP02)**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina Lane, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	115.15	0.058	2.30	0.001
NOx	100	2093.64	1.047	41.87	0.021
CO	84	1758.66	0.879	35.17	0.018
SO <sub>2</sub>	0.6	12.56	6.28E-03	0.25	1.26E-04
PM/PM10/PM2.5	7.6	159.12	0.080	3.18	0.002
Total HAPs	1.89E+00	39.54	0.020	0.79	3.95E-04
Arsenic	2.00E-04	4.19E-03	2.09E-06	8.37E-05	4.19E-08
Beryllium	1.20E-05	2.51E-04	1.26E-07	5.02E-06	2.51E-09
Cadmium	1.10E-03	0.02	1.15E-05	4.61E-04	2.30E-07
Chromium	1.40E-03	0.03	1.47E-05	5.86E-04	2.93E-07
Cobalt	8.40E-05	1.76E-03	8.79E-07	3.52E-05	1.76E-08
Lead	5.00E-04	0.01	5.23E-06	2.09E-04	1.05E-07
Manganese	3.80E-04	0.01	3.98E-06	1.59E-04	7.96E-08
Mercury	2.60E-04	5.44E-03	2.72E-06	1.09E-04	5.44E-08
Nickel	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Selenium	2.40E-05	5.02E-04	2.51E-07	1.00E-05	5.02E-09
Benzene	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Dichlorobenzene	1.20E-03	0.03	1.26E-05	5.02E-04	2.51E-07
Formaldehyde	7.50E-02	1.57	7.85E-04	3.14E-02	1.57E-05
Hexane <sup>(4)</sup>	1.80E+00	37.69	1.88E-02	7.54E-01	3.77E-04
Naphthalene	6.10E-04	0.01	6.39E-06	2.55E-04	1.28E-07
Toluene	3.40E-03	0.07	3.56E-05	1.42E-03	7.12E-07
POM	8.82E-05	1.85E-03	9.23E-07	3.69E-05	1.85E-08

(1) Based on maximum fuel requirements to operate dryers:

$$2.39 \text{ Total Max Burner Capacity (MMBtu/hr)}$$

$$8,760 \text{ hr/yr}$$

$$20,936 \text{ Annual MMBtu requirement} = [\text{Total Max Burner Capacity (MMBtu/hr)} * (\text{hr/yr})]$$

$$1,000 \text{ Btu/ft}^3$$

$$20,936,400 \text{ ft}^3/\text{yr of Natural Gas required per year} = [(\text{Annual MMBtu requirement}) * (1,000,000) / (1,000)]$$

(2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.

(3) VOC emissions from press dryer fuel combustion will be controlled by RTO1 at a  
98.0% VOC Control Efficiency

(4) Single Highest HAP.

**Appendix A: Emissions Calculations**  
**MAXIMUM EXPECTED EMISSION CALCULATIONS**  
**FUEL COMBUSTION EMISSIONS**  
**FLEXOGRAPHIC PRESS NO. 3 (FP03)**

**Company Name: Printpack, Inc.**  
**Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404**  
**Permit Number: F105-30497-00046**  
**Reviewer: Marcia Earl**  
**Date: April 2011**

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	115.15	0.058	2.30	0.001
NOx	100	2,093.64	1.047	41.87	0.021
CO	84	1,758.66	0.879	35.17	0.018
SO <sub>2</sub>	0.6	12.56	0.006	0.25	1.26E-04
PM/PM10/PM2.5	7.6	159.12	0.080	3.18	0.002
Total HAPs	1.89E+00	39.54	0.020	0.79	3.95E-04
Arsenic	2.00E-04	4.19E-03	2.09E-06	8.37E-05	4.19E-08
Beryllium	1.20E-05	2.51E-04	1.26E-07	5.02E-06	2.51E-09
Cadmium	1.10E-03	0.02	1.15E-05	4.61E-04	2.30E-07
Chromium	1.40E-03	0.03	1.47E-05	5.86E-04	2.93E-07
Cobalt	8.40E-05	0.00	8.79E-07	3.52E-05	1.76E-08
Lead	5.00E-04	0.01	5.23E-06	2.09E-04	1.05E-07
Manganese	3.80E-04	0.01	3.98E-06	1.59E-04	7.96E-08
Mercury	2.60E-04	5.44E-03	2.72E-06	1.09E-04	5.44E-08
Nickel	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Selenium	2.40E-05	5.02E-04	2.51E-07	1.00E-05	5.02E-09
Benzene	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Dichlorobenzene	1.20E-03	0.03	1.26E-05	5.02E-04	2.51E-07
Formaldehyde	7.50E-02	1.57	7.85E-04	3.14E-02	1.57E-05
Hexane <sup>(4)</sup>	1.80E+00	37.69	1.88E-02	7.54E-01	3.77E-04
Naphthalene	6.10E-04	0.01	6.39E-06	2.55E-04	1.28E-07
Toluene	3.40E-03	0.07	3.56E-05	1.42E-03	7.12E-07
POM	8.82E-05	1.85E-03	9.23E-07	3.69E-05	1.85E-08

- (1) Based on maximum fuel requirements to operate dryers:  
2.39 Total Max Burner Capacity (MMBtu/hr)  
8,760 hr/yr  
20,936 Annual MMBtu requirement = [Total Max Burner Capacity (MMBtu/hr) \* (hr/yr)]  
1,000 Btu/ft<sup>3</sup>  
20,936,400 ft<sup>3</sup>/yr of Natural Gas required per year = [(Annual MMBtu requirement)\*(1,000,000)/(1,000)]
- (2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.
- (3) VOC emissions from press dryer fuel combustion will be controlled by RTO1 at a  
98.0% VOC Control Efficiency
- (4) Single Highest HAP.

**Appendix A: Emissions Calculations**  
**MAXIMUM EXPECTED EMISSION CALCULATIONS**  
**FUEL COMBUSTION EMISSIONS**  
**FLEXOGRAPHIC PRESS NO. 4 (FP04)**

**Company Name: Printpack, Inc.**  
**Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404**  
**Permit Number: F105-30497-00046**  
**Reviewer: Marcia Earl**  
**Date: April 2011**

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	115.15	0.058	2.30	0.001
NOx	100	2093.64	1.047	41.87	0.021
CO	84	1758.66	0.879	35.17	0.018
SO <sub>2</sub>	0.6	12.56	6.28E-03	0.25	1.26E-04
PM/PM10/PM2.5	7.6	159.12	0.080	3.18	0.002
Total HAPs	1.89E+00	39.54	0.020	0.79	3.95E-04
Arsenic	2.00E-04	4.19E-03	2.09E-06	8.37E-05	4.19E-08
Beryllium	1.20E-05	2.51E-04	1.26E-07	5.02E-06	2.51E-09
Cadmium	1.10E-03	0.02	1.15E-05	4.61E-04	2.30E-07
Chromium	1.40E-03	0.03	1.47E-05	5.86E-04	2.93E-07
Cobalt	8.40E-05	1.76E-03	8.79E-07	3.52E-05	1.76E-08
Lead	5.00E-04	0.01	5.23E-06	2.09E-04	1.05E-07
Manganese	3.80E-04	0.01	3.98E-06	1.59E-04	7.96E-08
Mercury	2.60E-04	5.44E-03	2.72E-06	1.09E-04	5.44E-08
Nickel	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Selenium	2.40E-05	5.02E-04	2.51E-07	1.00E-05	5.02E-09
Benzene	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Dichlorobenzene	1.20E-03	0.03	1.26E-05	5.02E-04	2.51E-07
Formaldehyde	7.50E-02	1.57	7.85E-04	3.14E-02	1.57E-05
Hexane <sup>(1)</sup>	1.80E+00	37.69	1.88E-02	7.54E-01	3.77E-04
Naphthalene	6.10E-04	0.01	6.39E-06	2.55E-04	1.28E-07
Toluene	3.40E-03	0.07	3.56E-05	1.42E-03	7.12E-07
POM	8.82E-05	1.85E-03	9.23E-07	3.69E-05	1.85E-08

- (1) Based on maximum fuel requirements to operate dryers:  
2.39 Total Max Burner Capacity (MMBtu/hr)  
8,760 hr/yr  
20,936 Annual MMBtu requirement = [Total Max Burner Capacity (MMBtu/hr) \* (hr/yr)]  
1,000 Btu/ft<sup>3</sup>  
20,936,400 ft<sup>3</sup>/yr of Natural Gas required per year = [(Annual MMBtu requirement)\*(1,000,000)/(1,000)]
- (2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.
- (3) VOC emissions from press dryer fuel combustion will be controlled by RTO1 at a  
98.0% VOC Control Efficiency
- (4) Single Highest HAP.

**Appendix A: Emissions Calculations**  
**MAXIMUM EXPECTED EMISSION CALCULATIONS**  
**FUEL COMBUSTION EMISSIONS**  
**FLEXOGRAPHIC PRESS NO. 5 (FP05)**

**Company Name: Printpack, Inc.**  
**Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404**  
**Permit Number: F105-30497-00046**  
**Reviewer: Marcia Earl**  
**Date: April 2011**

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	115.15	0.058	2.30	0.001
NOx	100	2093.64	1.047	41.87	0.021
CO	84	1758.66	0.879	35.17	0.018
SO <sub>2</sub>	0.6	12.56	6.28E-03	0.25	1.26E-04
PM/PM10/PM2.5	7.6	159.12	0.080	3.18	0.002
Total HAPs	1.89E+00	39.54	0.020	0.79	3.95E-04
Arsenic	2.00E-04	4.19E-03	2.09E-06	8.37E-05	4.19E-08
Beryllium	1.20E-05	2.51E-04	1.26E-07	5.02E-06	2.51E-09
Cadmium	1.10E-03	0.02	1.15E-05	4.61E-04	2.30E-07
Chromium	1.40E-03	0.03	1.47E-05	5.86E-04	2.93E-07
Cobalt	8.40E-05	1.76E-03	8.79E-07	3.52E-05	1.76E-08
Lead	5.00E-04	0.01	5.23E-06	2.09E-04	1.05E-07
Manganese	3.80E-04	0.01	3.98E-06	1.59E-04	7.96E-08
Mercury	2.60E-04	5.44E-03	2.72E-06	1.09E-04	5.44E-08
Nickel	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Selenium	2.40E-05	5.02E-04	2.51E-07	1.00E-05	5.02E-09
Benzene	2.10E-03	0.04	2.20E-05	8.79E-04	4.40E-07
Dichlorobenzene	1.20E-03	0.03	1.26E-05	5.02E-04	2.51E-07
Formaldehyde	7.50E-02	1.57	7.85E-04	3.14E-02	1.57E-05
Hexane <sup>(4)</sup>	1.80E+00	37.69	1.88E-02	7.54E-01	3.77E-04
Naphthalene	6.10E-04	0.01	6.39E-06	2.55E-04	1.28E-07
Toluene	3.40E-03	0.07	3.56E-05	1.42E-03	7.12E-07
POM	8.82E-05	1.85E-03	9.23E-07	3.69E-05	1.85E-08

- (1) Based on maximum fuel requirements to operate dryers:  
2.39 Total Max Burner Capacity (MMBtu/hr)  
8,760 hr/yr  
20,936 Annual MMBtu requirement = [Total Max Burner Capacity (MMBtu/hr) \* (hr/yr)]  
1,000 Btu/ft<sup>3</sup>  
20,936,400 ft<sup>3</sup>/yr of Natural Gas required per year = [(Annual MMBtu requirement)\*(1,000,000)/(1,000)]
- (2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.
- (3) VOC emissions from press dryer fuel combustion will be controlled by RTO1 at a  
98.0% VOC Control Efficiency
- (4) Single Highest HAP.

**Appendix A: Emissions Calculations**  
**MAXIMUM EXPECTED EMISSION CALCULATIONS**  
**FUEL COMBUSTION EMISSIONS**  
**REGENERATIVE THERMAL OXIDIZER (RTO1)**

**Company Name: Printpack, Inc.**  
**Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404**  
**Permit Number: F105-30497-00046**  
**Reviewer: Marcia Earl**  
**Date: April 2011**

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (lbs/yr) <sup>(3)</sup>	Controlled Emissions (tons/yr) <sup>(3)</sup>
VOC <sup>(3)</sup>	5.5	794.97	0.397	15.90	0.008
NOx	100	14,454.00	7.227	289.08	0.145
CO	84	12,141.36	6.071	242.83	0.121
SO <sub>2</sub>	0.6	86.72	0.043	1.73	8.67E-04
PM/PM10/PM2.5	7.6	1,098.50	0.549	21.97	0.011
Total HAPs	1.89E+00	272.96	0.136	5.46	2.73E-03
Arsenic	2.00E-04	2.89E-02	1.45E-05	5.78E-04	2.89E-07
Beryllium	1.20E-05	1.73E-03	8.67E-07	3.47E-05	1.73E-08
Cadmium	1.10E-03	1.59E-01	7.95E-05	3.18E-03	1.59E-06
Chromium	1.40E-03	2.02E-01	1.01E-04	4.05E-03	2.02E-06
Cobalt	8.40E-05	1.21E-02	6.07E-06	2.43E-04	1.21E-07
Lead	5.00E-04	7.23E-02	3.61E-05	1.45E-03	7.23E-07
Manganese	3.80E-04	5.49E-02	2.75E-05	1.10E-03	5.49E-07
Mercury	2.60E-04	3.76E-02	1.88E-05	7.52E-04	3.76E-07
Nickel	2.10E-03	3.04E-01	1.52E-04	6.07E-03	3.04E-06
Selenium	2.40E-05	3.47E-03	1.73E-06	6.94E-05	3.47E-08
Benzene	2.10E-03	3.04E-01	1.52E-04	6.07E-03	3.04E-06
Dichlorobenzene	1.20E-03	1.73E-01	8.67E-05	3.47E-03	1.73E-06
Formaldehyde	7.50E-02	10.84	5.42E-03	0.22	1.08E-04
Hexane <sup>(4)</sup>	1.80E+00	260.17	1.30E-01	5.20	2.60E-03
Naphthalene	6.10E-04	8.82E-02	4.41E-05	1.76E-03	8.82E-07
Toluene	3.40E-03	4.91E-01	2.46E-04	9.83E-03	4.91E-06
POM	8.82E-05	1.27E-02	6.37E-06	2.55E-04	1.27E-07

(1) Based on maximum fuel requirements:

16.50 Total Max Burner Capacity (MMBtu/hr)  
8,760 hr/yr  
144,540 Annual MMBtu requirement = [Total Max Burner Capacity (MMBtu/hr) \* (hr/yr)]  
1,000 Btu/ft<sup>3</sup>  
144,540,000 ft<sup>3</sup>/yr of Natural Gas required per year = [(Annual MMBtu requirement)\*(1,000,000)/(1,000)]

(2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.

(3) VOC emissions from RTO1 fuel combustion will be controlled by RTO1.

98.0% VOC Control Efficiency

(4) Single Highest HAP.

**Appendix A: Emission Calculations  
Storage Tank Emissions  
Storage Tank Losses  
Volatile Organic Compound (VOC)**

**Company Name: Printpack, Inc.  
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404  
Permit Number: F105-30497-00046  
Reviewer: Marcia Earl  
Date: April 2011**

Storage Tank ID	Product Stored	Roof Type	Tank Dimensions	Maximum Liquid Height (ft)	Maximum Liquid Volume (gallons)	Turnovers per year	Product Throughput (gallons/yr)	VOC Uncontrolled Emissions (lbs/yr)	VOC Uncontrolled Emissions (tons/yr)
TK01	Isopropanol (80%)	Horizontal, Variable Vapor Space	10.0 ft dia 22.0 ft ht	10.0 ft	10,000	104	1,040,000	283.46	0.14
TK01	Ethyl Acetate (20%)	Horizontal, Variable Vapor Space	10.0 ft dia 22.0 ft ht	10.0 ft	10,000	104	1,040,000	174.79	0.09
TK02	Isopropanol (80%)	Horizontal, Variable Vapor Space	10.0 ft dia 22.0 ft ht	10.0 ft	10,000	104	1,040,000	283.46	0.14
TK02	Ethyl Acetate (20%)	Horizontal, Variable Vapor Space	10.0 ft dia 22.0 ft ht	10.0 ft	10,000	104	1,040,000	174.79	0.09
TK03	Isopropanol (80%)	Horizontal, Variable Vapor Space	10.0 ft dia 11.0 ft ht	10.0 ft	5,000	104	520,000	141.73	0.07
TK03	Ethyl Acetate (20%)	Horizontal, Variable Vapor Space	10.0 ft dia 11.0 ft ht	10.0 ft	5,000	104	520,000	87.39	0.04
TK04	Isopropanol (80%)	Horizontal, Variable Vapor Space	10.0 ft dia 11.0 ft ht	10.0 ft	5,000	104	520,000	141.73	0.07
TK04	Ethyl Acetate (20%)	Horizontal, Variable Vapor Space	10.0 ft dia 11.0 ft ht	10.0 ft	5,000	104	520,000	87.39	0.04
TK05	Normal Propanol (80%)	Vertical, Variable Vapor Space	8.0 ft dia 17.0 ft ht	17.0 ft	6,000	104	624,000	157.67	0.08
TK05	N-Propyl Acetate (20%)	Vertical, Variable Vapor Space	8.0 ft dia 17.0 ft ht	17.0 ft	6,000	104	624,000	97.22	0.05

**Total Potential to Emit VOC (tons/yr) = 0.81  
Total Potential to Emit VOC (lbs/day) = 4.46**

**ACRONYMS**

VOC = Volatile Organic Compound

Volatile Organic Compound (VOC) emissions from withdrawal and standing losses using US EPA TANKS Version 4.09 program

Using the Environmental Protection Agency's (EPA) TANKS Version 4.09d program, it was determined that use and storage of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

**Appendix A: Emissions Calculations  
 MAXIMUM EXPECTED EMISSION CALCULATIONS  
 FUEL COMBUSTION EMISSIONS  
 INSIGNIFICANT FUEL COMBUSTION SOURCES**

**Company Name:** Printpack, Inc.  
**Address City IN Zip:** 2121 N. Angelina Lane, Bloomington, IN 47404  
**Permit Number:** F105-30497-00046  
**Reviewer:** Marcia Earl  
**Date:** April 2011

Pollutant	Emission Factor (lb/MMft <sup>3</sup> )	Uncontrolled Emissions (lbs/yr)	Uncontrolled Emissions (ton/yr)
VOC	5.5	1,035	0.517
NOx	100	18,811	9.406
CO	84	15,801	7.901
SO <sub>2</sub>	0.6	113	0.056
PM/PM10/PM2.5	7.6	1,430	0.715
Total HAPs	1.89E+00	355	0.178
Arsenic	2.00E-04	3.76E-02	1.88E-05
Beryllium	1.20E-05	2.26E-03	1.13E-06
Cadmium	1.10E-03	2.07E-01	1.03E-04
Chromium	1.40E-03	2.63E-01	1.32E-04
Cobalt	8.40E-05	1.58E-02	7.90E-06
Lead	5.00E-04	9.41E-02	4.70E-05
Manganese	3.80E-04	7.15E-02	3.57E-05
Mercury	2.60E-04	4.89E-02	2.45E-05
Nickel	2.10E-03	3.95E-01	1.98E-04
Selenium	2.40E-05	4.51E-03	2.26E-06
Benzene	2.10E-03	3.95E-01	1.98E-04
Dichlorobenzene	1.20E-03	2.26E-01	1.13E-04
Formaldehyde	7.50E-02	14.11	7.05E-03
Hexane <sup>(7)</sup>	1.80	338.60	0.17
Naphthalene	6.10E-04	1.15E-01	5.74E-05
Toluene	3.40E-03	6.40E-01	3.20E-04
POM	8.82E-05	1.66E-02	8.30E-06

(1) Based on maximum fuel requirements:

21.5 Total Max Burner Capacity (MMBtu/hr)  
 8,760 hr/yr  
 188,112 Annual MMBtu requirement  
 1,000 Btu/ft<sup>3</sup>  
 188,112,240 ft<sup>3</sup>/yr of Natural Gas required per year

(2) Based on EPA AP-42 Supplement D (July 1998) emission factors for natural gas combustion.

(3) Total Max Burner Capacity based on the following insignificant sources:

Unit	Burner Size (MMBtu/hr)
Air Handling Unit -1A	2.5
Air Handling Unit -1B	2.5
Air Handling Unit -1C	2.5
Air Handling Unit -1D	2.5
Air Handling Unit -2A	2.5
Air Handling Unit -2B	2.5
Air Handling Unit -2C	2.5
Air Handling Unit -3	0.25
Air Handling Unit -4	0.875
Air Handling Unit -5	0.02
Air Handling Unit -6	0.25
Air Handling Unit -7	0.15
Air Handling Unit -8	0.15
ERU-1	1.25
MUA-1	0.07
Air Recirculation Unit -1	0.1
Air Recirculation Unit -2	0.1
Water Heater -1	0.285
Water Heater -2	0.237
Water Heater -3	0.237
<b>Total</b>	<b>21.474</b>

(4) Single Highest HAP.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Todd Wiederhold  
Printpack, Inc.  
2800 Overlook Pkwy  
Atlanta, GA 30339

**DATE:** August 1, 2011

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

**SUBJECT:** Final Decision  
Significant Permit Revision  
105-30497-00046

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:  
Camilo Cruz – Printpack, Inc.  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

August 1, 2011

TO: Monroe County Public Library

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

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

**Applicant Name: Printpack, Inc.**  
**Permit Number: 105-30497-00046**

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	GHOTOPP 8/1/2011 Printpack, Inc. 105-30497-00046 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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		Todd Wiederhold Printpack, Inc. 2800 Overlook Pkwy Atlanta GA 30339 (Source CAATS) via confirmed delivery										
2		Monroe Co Public Library 303 E Kirkwood Ave Bloomington IN 47408 (Library)										
3		Monroe County Health Department 119 W 7th St Bloomington IN 47404-3989 (Health Department)										
4		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
5		Bloomington City Council and Mayors Office 401 N. Morton St. Bloomington IN 47402 (Local Official)										
6		Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 (Affected Party)										
7		Monroe County Commissioners Monroe County Courthouse, Room 322 Bloomington IN 47404 (Local Official)										
8		Camilo Cruz Printpack, Inc. 2800 Overlook Pkwy Atlanta GA 30339 (Source – addl contact)										
9												
10												
11												
12												
13												
14												
15												

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