



# 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: March 1, 2012

RE: Bemis Company, Inc. / 167-31288I-00033

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

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March 1, 2012

Mr. Dan R Rose  
Bemis Company, Inc.  
1350 N Fruitridge Ave  
Terre Haute, IN 47804

Re: Interim Significant Source Modification Petition Approval  
167-31288I-00033

Dear Mr. Rose:

On February 6, 2012, the Office of Air Quality (OAQ) received an interim Significant Source Modification petition from Bemis Company, Inc., located at 1350 N Fruitridge Ave, Terre Haute, Indiana for construction of a flexographic printing press, identified as press #41.

A public notice of the interim Significant Source Modification petition was published in the Terre Haute Tribune Star on February 3, 2012. The public comment period ended on February 16, 2012.

There were no comments received during the public comment period. This interim Significant Source Modification petition is in effect upon issuance and will expire on the effective date of the final Significant Source Modification permit.

The interim Significant Source Modification petition may be revoked after the effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final Significant Source Modification permit is denied. The IDEM has reviewed this interim Significant Source Modification petition and has not found any such reason. The facilities subject to this approval may not operate until the final Significant Permit Modification is issued by IDEM's Office of Air Quality.

The interim Significant Source Modification petition is federally enforceable. Detailed construction and operation conditions will be specified in the final Significant Source Modification permit 167-31288-00033.

If you have any questions regarding this interim Significant Source Modification petition, please contact Swarna Prabha, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Swarna Prabha or extension 4-5376, or dial (317) 234-5376.

Sincerely,



Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Enclosure: Interim Permit Evaluation

SP

cc: File - Vigo County  
Vigo County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch

## Indiana Department of Environmental Management Office of Air Quality

<b>Interim Petition Checklist</b>	
<b>Instructions:</b> (a) Please answer yes or no.	
(b) Enclosed this checklist with the completed interim petition package.	
<b>Company Name:</b> Bemis Company, Inc.	
<b>Location:</b>	
Yes	1. Is the written interim petition prepared?
Yes	2. Is the written petition signed and dated?
Yes	3. Is the public notice drafted?
Yes	4. Is the filing and review fee enclosed? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
Yes	5. Is the account number written on the check or money order?
Yes	6. Is the Affidavit of Construction signed, dated, and notarized?
Yes	7. Is the proposed modification/revision described in detail?
Yes	8. Is the proposed modification/revision a modification or addition to an existing source?
Yes	9. Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
No	10. Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
	11. Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
Yes	12. Are potential emissions calculated?
Yes	13. Is federal enforceability consent specifically indicated?
Yes	14. Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
No	15. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
No	16. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
Yes	17. Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
Yes	18. Has a regular modification/revision permit application been submitted to OAQ?
No	19. Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
	20. The interim petition comment period has been decided to be: <u>14 calendar days</u>
<b>Additional Comments:</b>	

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE  
MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION**

Source Name: Bemis Company, Inc.  
Source Address: 1350 North Fruitridge Avenue, Terre Haute, Indiana 47804  
Mailing Address: Same  
SIC/NAICS Code: 2673 Primary, 3081 Secondary

**Description of the Operation or Equipment:**

Bemis Company, Inc. plans to install a flexographic printing press, identified as Press 41, at the site in Terre Haute, Indiana. The primary emissions are Volatile Organic Compounds (VOC) from the use of solvent based inks. Those emissions will be captured by enclosing the press in a Permanent Total Enclosure (PTE) to assure 100% capture efficiency. The captured emissions will be ducted to a system of oxidizers (both catalytic and regenerative thermal) in parallel that achieve a minimum of 95% destruction. The Significant Source (and Permit) Modification Application for this press was submitted to IDEM on December 16, 2011.

**Potential to Emit:**

The VOC potential to emit is 2,834 tons/year before control. After control the VOC potential to emit is 141.7 tons per year. The methodology and calculations of the potential to emit before and after control are attached.

**PSD Requirements:**

In the application for the Significant Source (and Permit) Application, as submitted on December 16, 2011, Bemis requested a combination of permit conditions to keep the project below the significance level for PSD review. The Terre Haute site is currently a major source with respect to PSD permitting. The requested conditions included: use of control equipment with minimum efficiencies higher than those specified in 326 IAC 8-5-5 and a cap on actual emissions to less than 40 tons per year. The specific requested conditions were:

- (a) The annual VOC usage on press #41 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation:  $(\text{Printing VOC usage}) * (1 - \text{fraction overall control efficiency}) + \text{Cleanup VOC loss} < 39.99 \text{ tons}$ . Compliance with this condition shall make this press not subject to the provisions of 326 IAC 2-2, Prevention of Significant Deterioration (PSD).
- (b) Whenever press #41 is applying VOC containing materials, the press exhaust shall be vented through the operating oxidation control system. The press shall maintain a minimum overall control efficiency of 95% for VOC emissions.

**NSPS Requirements:**

There is no applicable NSPS rule applicable to this operation or equipment.

**NESHAP Requirements:**

There is no applicable NESHAP rule applicable to this operation or equipment.

**State Rules & Requirements:**

- (a) Pursuant to 326 IAC 8-5-5(e)(2)(C), the VOC capture system for press #41, in combination with the catalytic/regenerative thermal oxidation system, shall be operated in such a manner to attain and maintain a minimum 75% overall control efficiency for flexographic printing.
- (b) 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.
- (c) Testing of press #41, to verify its capture efficiency, shall be performed within 180 days of initial operation.
- (d) The Permittee shall maintain one of the following monitoring parameter values for each press enclosed in a PTE for each day the press is operating as an indication that 100 percent capture is being attained:
  - (1) Differential pressure - The Permittee shall maintain a differential pressure at a value of negative (-) 0.007 inches of water column or less, or
  - (2) Differential pressure - The Permittee shall maintain a differential pressure at or less than a value demonstrated during the most recent performance test as being sufficient to meet the 200 feet/min face velocity at all NDOs.
- (e) Press #41 is subject to the CAM requirements pursuant to 40 CFR Part 64. The CAM Plan for Bemis in Terre Haute has previously been submitted and approved.
- (f) Conduct quarterly inspections of the VOC capture system.
- (g) Keep material use records sufficient to demonstrate compliance with the emissions limit.

**Federal Enforceability:**

The company consents to the federal enforceability of this interim petition.

Signature: 

Printed Name: Bray Brunkhurst

Title or Position: Vice President of Operations - Poly

Phone Number: (812) 460-6253

Date: JAN. 30, 2012

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Source Modification  
for **Bemis Company, Inc.**  
in **Vigo County**

Notice is hereby given that the above company located at 1350 North Fruitridge Avenue, Terre Haute, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a flexographic printing press with oxidation as air pollution control. Based on 8,760 hours per year of operation, the Volatile Organic Compound (VOC) emissions are 2,834 (before control) tons per year, respectively. *The actual VOC emissions will be limited on an after control basis to less than 40 tons per year.*

The company has submitted an application for a significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Vigo County Public Library, 1 Library Square, Terre Haute, Indiana, 47807**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:

 1-30-12

Company Official's Printed Name:

Bray Brunkhurst

Company Name:

Bemis Company, Inc.

### Affidavit of Construction

I, Bray Brunkhurst, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in Vigo County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of Vice President of Operations - Poly for Bemis Company, Inc.  
(Title) (Company Name)

3. By virtue of my position with Bemis Company, Inc., I have personal  
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Bemis Company, Inc.  
(Company Name)

4. I, the undersigned, have submitted an interim (~~minor permit revision, significant permit revision, minor source modification,~~ **significant source modification**) petition to the Office of Air Quality for the construction of Press 41 (Flexographic Printing Press)

5. Bemis Company, Inc. recognizes the following risks:  
(Company Name)

- (a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and
- (d) any additional air permitting requirements.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature: *Bray Brunkhurst*

Printed Name: Bray Brunkhurst

Phone No.: (812) 460-6253

Date: Jan. 30, 2012

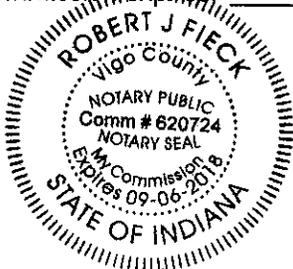
STATE OF INDIANA)

COUNTY OF Vigo )SS

Subscribed and sworn to me, a notary public in and for Vigo

County and State of Indiana on this 30<sup>th</sup> day of January, 20 12.

My Commission expires: 09-06-2018



Signature: *Robert J Fieck*

Printed Name: Robert J Fieck

**Bemis Company, Inc - Terre Haute Press #41 Project Emission Summary**  
 Maximum Theoretical Emissions and Potential Emissions

Process	MTE (ton per year)					PTE (ton per year)				
	VOC	CO	NOx	Part	CO2e	VOC	CO	NOx	Part	CO2e
Printing	2,833.9					141.7				
Dryer (Combustion)	0.02	0.23	0.28	0.02	335.8	0.02	0.23	0.28	0.02	335.8
Dusting				0.41					0.41	
<b>TOTAL</b>	<b>2,833.9</b>	<b>0.23</b>	<b>0.28</b>	<b>0.43</b>	<b>335.8</b>	<b>40*</b>	<b>0.23</b>	<b>0.28</b>	<b>0.43</b>	<b>335.8</b>

\* Requesting VOC limit of less than 40 tons per year in this application.

Projected Actual Emissions

Process	Projected Actual Emissions (ton per year)				
	VOC	CO	NOx	Part	CO2e
Printing	16.3				
Dryer (Combustion)	0.01	0.09	0.10	0.01	125.9
Dusting				0.08	
<b>TOTAL</b>	<b>16.3</b>	<b>0.09</b>	<b>0.10</b>	<b>0.08</b>	<b>125.9</b>

Note: Some items might not appear to add up correctly. This is due to rounding for display purposes. For purposes of PM2.5 estimation, the combustion related emissions are assumed to be the same as the PM10 estimates.

BEMIS COMPANY  
(Government Agency)  
VIGO COUNTY, IN

To: \_\_\_\_\_

Placed By: **RECEIVED**

FEB 3 2012

PUBLISHER'S CLAIM

BEMIS CO INC  
TERRE HAUTE

LINE COUNT

Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set) number of equivalent lines \_\_\_\_\_

Head -- number of lines	_____	1
Body -- number of lines	_____	262
Tail -- number of lines	_____	1
Total number of lines in notice	_____	264

COMPUT	NOTICE OF 14-DAY PERIOD FOR PUBLIC COMMENT	S		
264	Proposed Approval of Interim Significant Source Modification for Bemis Company, Inc. in Vigo County		1 columns wide equal _____ equivalent lines	
co	Notice is hereby given that the above company located at 1350 North Fulridge Avenue, Terre Haute, Indiana, has made application to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) for an interim permit to construct a flexographic printing press with oxidation as air pollution control. Based on 8,760 hours per year of operation, the (VOC) emissions are 2,894 (before control) tons per year, respectively. The actual VOC emissions will be limited on an after control basis to less than 40 tons per year.		per day _____	\$ 264.04
Addition of above Charge of two)			containing rule or tabular work (50 per cent _____)	
TOT			lication (\$1.00 for each proof in excess _____)	
A			IM _____	\$ 264.04
YOUR			47185	
DATA			COST	
Width	The company has submitted an application for a significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicants own risk.		7.4 ems	
Numb			1	
Size			7 point	

provisions and penalties of Chapter 155, Acts 1953, that the foregoing account is just and correct, that the amount claimed is legally due, after showing all just no part of the same has been paid.

*Kim Wilkerson*

2/2012 Title: Legal Clerk/ Kim Wilkerson

PUBLISHER'S AFFIDAVIT

State of Indiana )  
Vigo ) ss:  
County )

Personally appeared before me, a notary public in and for said county and state, the undersigned Kim Wilkerson who, being duly sworn, says that she is LEGAL CLERK of the Tribune Star newspaper general circulation printed and published in the English language in the (city) (town) of Terre Haute, IN in state and county aforesaid, and that the printed matter attached hereto is a true copy, which was duly published in said paper for 1 time(s), the dates of publication being as follows:

February 2, 2012

Subscribed and sworn to me this 2 day of February Sandra Seeley

Notary Public Vigo County

My commission expires

2/16/2015



SANDRA SEELEY  
Notary Public, State of Indiana  
Vigo County  
My Commission Expires  
February 16, 2015

ATTENTION: Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice. Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251, or call (800) 451-6027 or (317) 233-0178. Bray Brunhurs  
Bemis Company, Inc.  
14058 TS 2/2/12



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Toll Free (800) 451-6027  
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## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dan R Rose  
Bemis Company, Inc.  
1350 N Fruitridge Avenue  
Terre Haute, IN 47804

DATE: March 1, 2012

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

SUBJECT: Final Decision  
Interim  
167-31288i-00033

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:  
Bray Brunkhurst – VP of Operations  
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

# Mail Code 61-53

IDEM Staff	GHOTOPP 3/1/2012 Bemis Company, Inc 167-312881-00033 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		Dan R Rose Bemis Company, Inc 1350 N Fruitridge Ave Terre Haute IN 47804-1716 (Source CAATS) via confirmed delivery										
2		Bray Brunkhurst VP of Ops - Poly Bemis Company, Inc 1350 N Fruitridge Ave Terre Haute IN 47804-1716 (RO CAATS)										
3		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
4		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)										
5		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
6		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
7		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)										
8												
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.
6			