INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 6, 2012

RE: Printpack, Inc. / 105-31602-00046

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

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

June 6, 2012

Re: 105-31602-00046
Second Significant Permit Revision to
F105-28231-00046

Dear 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 2121 N. Angelina Lane, Bloomington, IN 47404. On March 12, 2012, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of an additional flexographic printing press (FP08) and associated press drying oven (FD08) with the uncontrolled potential to emit VOC greater than 25 tons of VOC per year, of the same type and that will comply with the same applicable requirements and permit terms and conditions as the existing printing presses and press drying ovens. Additionally, the applicant requested to add ten (10) additional insignificant units (BM machines) of the same type as the existing BM machines. The source also requested that the emission unit identification numbers for the five (5) existing flexographic printing presses be revised to FP01, FP03, FP05, FP06, and FP07, and the five (5) existing press drying ovens be revised to FD01, FD03, FD05, FD06, and FD07.

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 Summer Keown, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit
NB/SK
cc: File - Monroe County
Monroe County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section

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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. Dumaual, 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 on August 1, 2011

Second Significant Permit Revision No. 105-31602-00046	
Issued by: Nathan Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 6, 2012 Expiration Date: May 5, 2015

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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) Six (6) flexographic printing presses, identified as FP01, FP03, FP05, FP06, constructed in 2010, FP07, approved for construction in 2011, and FP08, approved for construction in

2012, 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) Six (6) press drying ovens, identified as FD01, FD03, FD05, FD06, constructed in 2010, FD07, approved for construction in 2011, and FD08, approved for construction in 2012, 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 BM Machines BM01 through BM34, 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) But 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)]

(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) and (c) 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)(1) and (c). 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)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
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(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sample or measurement.

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. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. 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) Six (6) flexographic printing presses, identified as FP01, FP03, FP05, FP06, constructed in 2010, FP07, approved for construction in 2011, and FP08, approved for construction in 2012, 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) Six (6) press drying ovens, identified as FD01, FD03, FD05, FD06, constructed in 2010, FD07, approved for construction in 2011, and FD08, approved for construction in 2012, 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, FP03, FP05, FP06, FP07, and FP08, 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, FP03, FP05, FP06, FP07, and FP08, 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, FP03, FP05, FP06, FP07, and FP08 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, FP03, FP05, FP06, FP07, and FP08), 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, FP03, FP05, FP06, FP07, and FP08) and the photopolymer plate-making unit (PH01) at all times that one (1) or more of the printing presses (FP01, FP03, FP05, FP06, FP07, and FP08) 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, FP03, FP05, FP06, FP07, and FP08) 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) When for any one reading, the the duct pressure or AC frequency (Hz) of the variable frequency drive is outside the normal range as established during the compliant stack test performed most recently, 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 duct pressure or AC frequency (Hz) of the variable frequency drive 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 (4) below. Records maintained for (1) through (4) 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 the compliance status with Condition D.1.1(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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)

Pursurant 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**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
- 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

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_2, VOC, NO_X, 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, FP03, FP05, FP06, FP07 and FP08 and the photopolymer plate-making unit PH01
Parameter:	Volatile Organic Compounds (VOC)
Limit:	The total VOC input to printing presses FP01, FP03, FP05, FP06, FP07 and FP08 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

QUARTER: _____ 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: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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 (Plastics, Foil, and Coated Paper Bags)**
Operation Permit No.:	**F105-28231-00046**
Operation Permit Issuance Date:	**May 5, 2010**
Significant Permit Revision No.:	**105-31602-00046**
Permit Reviewer:	**Summer Keown**

On March 12, 2012, 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. The source has since received Significant Permit Revision No. 105-30497-00046, issued on August 1, 2011.

County Attainment Status

The source is located in Monroe County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]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 PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. 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) $PM_{2.5}$
Monroe County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Monroe County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, 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)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Printing Presses FP01, FP03, FP05, FP06 and FP07	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	0.00	0.00
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
Storage Tanks TK01-TK05, RT01	0.00	0.00	0.00	0.00	0.00	0.82	0.00	0.00	0.00	0.00
5 Press Drying Ovens	0.11	0.40	0.40	0.33	7.42	0.57	4.40	7292	0.14	0.09 (hexane)
RTO1	0.16	0.55	0.55	0.04	10.27	0.79	5.92	10097	0.14	0.13 (hexane)
Parts Washer PW01	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	0.00

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Insignificant Fuel Combustion Sources	0.18	0.71	0.71	0.06	9.41	0.52	7.90	11355	0.18	0.17 (hexane)
Total PTE of Entire Source	**0.45**	**1.67**	**1.67**	**0.13**	**27.09**	**99.39**	**18.22**	**28,744**	**0.41**	**0.39 (hexane)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
These emissions are based upon Significant Permit Revision No. 105-30497-00046, issued on August 1, 2011.
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 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(ff)(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 Office of Air Quality (OAQ) has reviewed an application, submitted by Printpack, Inc. on March 12, 2012, relating to the addition of an additional flexographic printing press (FP08) and associated press drying oven (FD08) of the same type and that will comply with the same applicable requirements and permit terms and conditions of the existing printing presses and drying ovens. Additionally, the applicant requested to add ten (10) additional insignificant units (BM machines) of the same type as the existing BM machines. The source also requested that the emission unit identification numbers for the five (5) existing flexographic printing presses be revised to FP01, FP03, FP05, FP06, and FP07, and the five (5) existing press drying ovens be revised to FD01, FD03, FD05, FD06, and FD07.

The following is a list of the new emission units:

(a) One (1) flexographic printing press, identified as FP08, approved for construction in 2012, using continuous web feed of material, 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.

(b) One (1) press drying oven, identified as FD08, approved for construction in 2012, 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, 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 following is a list of the new insignificant emission units:

(c) Activities or emission units, identified as BM Machines 25 through 34, for which the potential uncontrolled emissions for PM10 are equal to or less than one (1) pound per day.

The emission unit descriptions in the permit have been revised to include the new units and to re-name several existing emission units as follows, with deleted language as ~~strikethrough~~ text and new language as **bold** text:

(d) Five (5) flexographic printing presses, identified as FP01, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06**, constructed in 2010, ~~and~~ FP~~05~~**07**, approved for construction in 2011, **and FP08, approved for construction in 2012,** 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.

(e) Five (5) press drying ovens, identified as FD01, FD~~02~~**03**, FD~~03~~**05**, FD~~04~~**06**, constructed in 2010, ~~and~~ FD~~05~~**07**, approved for construction in 2011, **and FD08, approved for construction in 2012,** 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.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

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_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Printing Press FP08	0.00	0.00	0.00	0.00	0.00	3342.31	0.00	0.00	0.00	0.00
Press 8 Drying Oven (FD08)	0.02	0.08	0.08	0.01	1.48	0.11	0.86	1458	0.02	0.02 (hexane)
Total PTE of Proposed Revision	0.02	0.08	0.08	0.01	1.48	3342.42	0.86	1458	0.02	0.02 (hexane)
negl. = negligible										

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E), because the revision involves the construction of a printing press with uncontrolled/unlimited potential to emit (PTE) VOC greater than 25 tons per year.

PTE of the Entire Source After Issuance of the FESOP Revision

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_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Printing Presses FP01, FP03, FP05, FP06, FP07 and FP08	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	0.00	0.00
Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00		0.00	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	0.00
6 Press Drying Ovens	0.14	0.48	0.48	004	8.90	0.01	5.28	8750	0.12	0.11 (hexane)
RTO1	0.16	0.55	0.55	0.04	10.27	0.79	5.92	10097	0.14	0.13 (hexane)
Parts Washer PW01	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	0.00
Insignificant Fuel Combustion Sources	0.18	0.71	0.71	0.06	9.41	0.52	7.90	11355	0.18	0.17 (hexane)
Total PTE of Entire Source	0.47	1.75	1.75	0.13	28.57	99.40	19.10	30,202	0.43	0.41 (hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	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 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) FESOP Status

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), the source shall comply with the following:

(1) the total VOC input to printing presses FP01, FP03, FP05, FP06, FP07, and FP08, 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

(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 total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source
This modification 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 less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 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, FP03, FP05, FP06, FP07, and FP08, 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

(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 total potential to emit of VOC to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

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 HAPs.

(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 HAPs.

(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 HAPs.

(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)

(g) 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)
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). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification 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 less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. 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.

Printing Press FP08

(g) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The new printing press (FP08) is not subject to 326 IAC 6-3-2, because the printing press is not a source of particulate emissions.

(h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The new printing press (FP08) is not subject to the requirements of 326 IAC 8-1-6, since the it is subject to the requirements of 326 IAC 8-5-5.

(i) 326 IAC 8-2-5 (Paper Coating Operations)
The new printing press (FP08) is not subject to 326 IAC 8-2-5 (Paper Coating Operations), because it is subject to the provisions of 326 IAC 8-5-5.

(j) 326 IAC 8-5-5 (Graphic Arts Operations)
The new flexographic printing press, identified as FP08, is subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because it will be 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, FP03, FP05, FP06, FP07, and FP08 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, FP03, FP05, FP06, FP07, and FP08 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:

(A) When not in use, all cleaning materials shall be kept in closed containers.

(B) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

Drying Oven FD08

(k) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The new drying oven, identified as FD08, is not subject to 326 IAC 6-2 because it is not a source of indirect heating.

Compliance Determination, Monitoring and Testing Requirements

(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 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the overall VOC control efficiency and 326 IAC 8-5-5.

(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 performed most recently.

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 with the overall VOC control efficiency and 326 IAC 8-5-5.

(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, FP03, FP05, FP06, FP07 and FP08) 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, FP03, FP05, FP06, FP07 and FP08) 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.

Proposed Changes

(a) The following changes below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

...

(f) **Six (6)** ~~Five (5)~~ flexographic printing presses, identified as FP01, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06**, constructed in 2010, ~~and~~ FP~~05~~**07**, approved for construction in 2011, **and FP08, approved for construction in 2012,** 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) **Six (6)** ~~Five (5)~~ press drying ovens, identified as FD01, FD~~02~~**03**, FD~~03~~**05**, FD~~04~~**06**, constructed in 2010, ~~and~~ FD~~05~~**07**, approved for construction in 2011, **and FD08, approved for construction in 2012,** 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)]

...

(1) Activities or emission units, identified as **BM Machines** BM01 through BM~~24~~**34**, for which the potential uncontrolled emissions for PM10 are equal to or less than one (1) pound per day.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(f) **Six (6)** ~~Five (5)~~ flexographic printing presses, identified as FP01, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06**, constructed in 2010, ~~and~~ FP~~05~~**07**, approved for construction in 2011, **and FP08, approved for construction in 2012,** 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) **Six (6)** ~~Five (5)~~ press drying ovens, identified as FD01, FD~~02~~**03**, FD~~03~~**05**, FD~~04~~**06**, constructed in 2010, ~~and~~ FD~~05~~**07**, approved for construction in 2011, **and FD08, approved for construction in 2012,** 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.

...

...

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, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06**, ~~and~~ FP~~05~~**07**, **and FP08,** 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

...

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**, FP03, FP05, FP06, FP07 and** ~~through~~ FP~~05~~**08**, 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**, FP03, FP05, FP06, FP07 and** ~~through~~ FP~~05~~**08**~~,~~ shall maintain a minimum destruction efficiency of 90%.

...

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

A Preventive Maintenance Plan is required for the printing presses (FP01**, FP03, FP05, PF06, FP07 and** ~~through~~ FP~~05~~**08**), 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.

...

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**, FP03, FP05, FP06, FP07 and** ~~through~~ FP~~05~~**08**) and the photopolymer plate-making unit (PH01) at all times that one (1) or more of the printing presses (FP01**, FP03, FP05, FP06, FP07 and** ~~through~~ FP~~05~~**08**) 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**, FP03, FP05, FP06, FP07 and** ~~through~~ FP~~05~~**08**) 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.

...

D.1.8 Parametric Monitoring

...

(c) **When for any one reading, the the duct pressure or AC frequency (Hz) of the variable frequency drive is outside the normal range as established during the compliant stack test performed most recently, t**~~T~~he 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 **duct** pressure **or AC frequency (Hz) of the variable frequency drive** 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.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 (**4**~~5~~) below. Records maintained for (1) through (**4**~~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.

...

D.1.10 Reporting Requirements

A quarterly summary of the information to document **the** compliance status with Condition D.1.1(a) shall be submitted**, using the reporting forms located at the end of this permit, or their equivalent,** no 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**s** the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

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, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06,** ~~and~~ FP~~05~~**07 and FP08** and the photopolymer plate-making unit PH01
Parameter:	Volatile Organic Compounds (VOC)
Limit:	The total VOC input to printing presses FP01, FP~~02~~**03**, FP~~03~~**05**, FP~~04~~**06,** ~~and~~ FP~~05~~**07 and FP08** 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

QUARTER: _____ YEAR:_____

...

(b) 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:

1. IDEM, OAQ has revised Section B - Preventive Maintenance Plan to clarify the applicable rule citations.

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

...

2. IDEM, OAQ has revised Section B - Operational Flexibility to update the applicable rule citations. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions, but only changes to the site of these rules.

B.19 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) **and (c)**~~ through (d)~~ without a prior permit revision, if each of the following conditions is met:

...

(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)**(1) and (c)**~~ 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)**(1) and (c)**~~(2), (c)(1), and (d)~~.

(b) Emission Trades [326 IAC 2-8-15**(b)**~~(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**(b)**~~(c)~~.

(c) Alternative Operating Scenarios [326 IAC 2-8-15**(c)**~~(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.

...

3. IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

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. **Support information includes the following:**

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sample or measurement.

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.

4. IDEM has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

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. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph.** 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.

...

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

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting.** 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".

...

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 March 12, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 105-31602-00046. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

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

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Appendix A: Emissions Calculations
Summary

Company Name: Printpack, Inc.
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404
Permit Number: 105-31602-00046
Permit Reviewer: Summer Keown
Date: March 30, 2012

Potential to Emit (tons/yr) - Unrestricted

	Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single Highest HAP	
Existing Units	Printing Presses (FP01, FP03, FP05, FP06, and FP07)	0.00	0.00	0.00	0.00	0.00	16,711.53	0.00	0.00	0.00	0.00	---
	Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	40.76	0.00	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	0.00	---
	5 Press Drying Ovens*	0.11	0.40	0.40	0.03	7.42	0.57	4.40	7292	0.10	0.09	(hexane)
	RTO1*	0.16	0.55	0.55	0.04	10.27	0.79	5.92	10097	0.14	0.13	(hexane)
	Parts Washer (PW01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	0.00	---
	Insignificant Fuel Combustion Sources	0.18	0.71	0.71	0.06	9.41	0.52	7.90	11355	0.18	0.17	(hexane)
New Units	Printing Press FP08	0.00	0.00	0.00	0.00	0.00	3342.31	0.00	0.00	0.00	0.00	---
	Press 6 Drying Oven (FD08)*	0.02	0.08	0.08	0.006	1.48	0.11	0.86	1458	0.02	0.019	(hexane)
	Totals	**0.47**	**1.75**	**1.75**	**0.13**	**28.57**	**20,100**	**19.08**	**30,202**	**0.43**	**0.41**	**(hexane)**

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

	Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single Highest HAP	
New and Existing Units	Photopolymer Plate-Making Unit (PH01)	0.00	0.00	0.00	0.00	0.00	95.54	0.00	0.00	0.00	0.00	---
	Printing Presses (FP01, FP03, FP05, FP06, FP07, and FP08)	0.00	0.00	0.00	0.00	0.00		0.00	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	0.00	---
	6 Press Drying Ovens*	0.14	0.48	0.48	0.04	8.90	0.01	5.28	8750	0.12	0.11	(hexane)
	RTO1*	0.16	0.55	0.55	0.04	10.27	0.02	5.92	10097	0.14	0.13	(hexane)
	Parts Washer (PW01)	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	0.00	---
	Insignificant Fuel Combustion Sources	0.18	0.71	0.71	0.06	9.41	0.52	7.90	11355	0.18	0.17	(hexane)
	Totals	**0.47**	**1.75**	**1.75**	**0.13**	**28.57**	**99.40**	**19.10**	**30,202**	**0.43**	**0.41**	**(hexane)**

*Because the press drying ovens and thermal oxidizer can be fired with either natural gas or propane, the calculations contain both scenarios and the worst-case calculations are used for potential emissions for each unit.

Appendix A: Emissions Calculations
PRINTING PRESS EMISSION CALCULATIONS

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Permit Reviewer: **Summer Keown**
Date: **March 30, 2012**

Potential Emissions		Limited Emissions	
8,760	hrs/yr	5,800	hrs/yr
2,000	ft/min	1,590	ft/min
1,051,200,000	ft/yr	553,320,000	ft/yr
65	max web width (in)	65	max web width (in)
5,694,000,000	sq ft/yr	2,997,150,000	sq ft/yr
3,000	sq ft/ream	3,000	sq ft/ream
1,898,000	reams/yr	999,050	reams/yr
VOC Usage		**VOC Usage**	
1.50	lbs ink solids/ream	0.8296	lbs ink solids/ream
2.33	lbs VOC/lbs ink solids	1.86	lbs VOC/lbs ink solids
1,898,000	reams/yr	999,050	reams/yr
6,643,000	lbs VOC/yr	1,539,222	lbs VOC/yr
3,321.50	tons VOC/yr	769.61	tons VOC/yr
Clean Up		**Clean Up**	
0.5	gal/deck/changeover	0.5	gal/deck/changeover
10	decks	10	decks
3	changeovers/day	3	changeovers/day
365	days/yr	365	days/yr
7.6	lbs/gal	7.6	lbs/gal
41,610	lbs/yr	41,610	lbs/yr
20.81	tons/yr	20.81	tons/yr
Press Total (one (1) press)		**Press Total (one (1) press)**	
6,684,610	lbs VOC usage/yr	1,580,832	lbs VOC usage/yr
763	lbs VOC usage/hr	273	lbs VOC usage/hr
3,342	tons VOC usage/yr PTE before controls	790	tons VOC usage/yr limted - before controls
98.0%	Total Control Efficiency	98.0%	Total Control Efficiency
66.85	ton VOC emissions/yr PTE after controls	15.81	ton VOC emissions/yr limited - after controls
15.26	lbs VOC emissions/hr PTE after controls	5.45	lbs VOC emissions/hr limited after controls
20,053.83	tpy of VOC for 6 presses before controls	4,742.50	tpy of VOC for all 6 presses limited before controls
401.08	tpy of VOC for 6 presses after controls	94.85	tpy of VOC for all 6 presses limited after controls

Note: These calculations were submitted by the applicant and approved by IDEM.

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: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Potential Emissions		**Limited* Emissions**	
8,760	hrs/yr	4,380	hrs/yr
17.50	ft^2/plate	17.50	ft^2/plate
3	plates/hr	3	plates/hr
459,900	ft^2/yr	229,950	ft^2/yr
VOC Usage		**VOC Usage**	
7.09	lbs VOC/gal of washout solution	7.09	lbs VOC/gal of washout solution
0.25	gal of washout solution/ft^2 of plate material	0.25	gal of washout solution/ft^2 of plate material
10%	evaporation rate	10%	evaporation rate
Photopolymer Total		**Photopolymer Total**	
81,517	lbs VOC usage/yr	40,759	lbs VOC usage/yr (total usage)
3.1	lbs VOC usage/plate	3.1	lbs VOC usage/plate
40.76	tons VOC usage/yr PTE before controls	20.38	tons VOC usage/yr limited - before controls (evaporated)
98.0%	Total Control Efficiency	98.0%	Total Control Efficiency
0.82	ton VOC emissions/yr PTE after controls	0.41	ton VOC emissions/yr limited - after controls (evaporated)

Note: These calculations were submitted by the applicant and approved by IDEM.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Press drying ovens

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Emission Unit	MMBtu/hr
FD01	2.39
FD03	2.39
FD05	2.39
FD06	2.39
FD07	2.39
FD08	2.39
Total	14.34

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
14.3	1000	125.6

	Pollutant							
	PM*	PM10*	direct PM2.5*	SO2	NOx	Uncontrolled VOC	Controlled VOC***	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	0.1	84
Potential Emissions for 1 dryer in tons/yr	0.02	0.08	0.08	0.01	1.05	0.06	0.0001	0.88
Potential Emissions for 6 dryers in tons/yr	0.12	0.48	0.48	0.04	6.28	0.35	0.001	5.28

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
***VOC emissions from the press drying ovens are exhausted to the RTO, which has a minimum 98% control efficiency.

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Press drying ovens
HAPs Emissions

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emissions for 1 dryer in tons/yr	2.20E-05	1.26E-05	7.85E-04	1.88E-02	3.56E-05
Potential Emissions for 6 dryers in tons/yr	1.3E-04	7.5E-05	4.7E-03	0.11	2.1E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emissions for 1 dryer in tons/yr	5.23E-06	1.15E-05	1.47E-05	3.98E-06	2.20E-05	0.02
Potential Emissions for 6 dryers in tons/yr	3.1E-05	6.9E-05	8.8E-05	2.4E-05	1.3E-04	0.12

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 6 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Press drying ovens
Greenhouse Gas Emissions

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emissions for 1 dryer in tons/yr	1256.18	0.02	0.02
Potential Emissions for 6 dryers in tons/yr	7,537	0.1	0.1
Summed Potential Emissions for 6 dryers in tons/yr	1256.23		
Summed Potential Emissions for 1 dryer in tons/yr	7,537		
CO2e Total for 1 dryer in tons/yr	1264		
CO2e Total for 6 dryers in tons/yr	7,583		

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.
Global 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 Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
Press Drying Ovens

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Emission Unit	MMBtu/hr
FD01	2.39
FD03	2.39
FD05	2.39
FD06	2.39
FD07	2.39
FD08	2.39
Total	14.34

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S		
		S = Sulfur Content =	0.50	grains/100ft^3
14.30	1369.05			

	Pollutant							
	PM*	PM10*	direct PM2.5**	SO2	NOx	Uncontrolled VOC	Controlled VOC***	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.1	13.0	1.0	0.02	7.5
				(0.10S)		**TOC value		
Potential Emissions for 1 dryer in tons/yr	0.02	0.08	0.08	0.01	1.48	0.11	0.002	0.86
Potential Emissions for 6 dryers in tons/yr	0.14	0.48	0.48	0.03	8.90	0.68	0.01	5.13

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.
** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.
**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.
***VOC emissions from the press drying ovens are exhausted to the RTO, which has a minimum 98% control efficiency.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Propane Emission Factors shown. Please see AP-42 for butane.
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
See Page 8 for Greenhouse Gas calculations.

Appendix A: Emission Calculations
Press Drying Ovens
Greenhouse Gas

Company Name: Printpack, Inc.
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404
Permit Number: 105-31602-00046
Reviewer: Summer Keown
Date: March 30, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emissions for 1 dryer in tons/yr	1426.09	0.02	0.10
Potential Emissions for 6 dryers in tons/yr	8,557	0.1	0.6
Summed Potential Emissions for 6 dryers in tons/yr	1426		
Summed Potential Emissions for 1 dryer in tons/yr	8,557		
CO2e Total for 1 dryer in tons/yr	1458		
CO2e Total for 6 dryers in tons/yr	8,750		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.
Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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 Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Regenerative Thermal Oxidizer RTO1

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
16.5	1000	144.5

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emissions for 1 dryer in tons/yr	0.02	0.09	0.09	0.01	1.20	0.07	1.01

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 10 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Regenerative Thermal Oxidizer RTO1
HAPs Emissions

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.518E-04	8.672E-05	5.420E-03	1.301E-01	2.457E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.614E-05	7.950E-05	1.012E-04	2.746E-05	1.518E-04	0.14

Methodology is the same as page 9.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 11 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Regenerative Thermal Oxidizer RTO1
Greenhouse Gas Emissions

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	8,672	0.2	0.2
Summed Potential Emissions in tons/yr	8,673		
CO2e Total in tons/yr	8,725		

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.
Global 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 Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
Thermal Oxidizer RTO1

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur Content =	0.50	grains/100ft^3
16.50	1579.67			

	Pollutant							
	PM*	PM10*	direct PM2.5**	SO2	NOx	Uncontrolled VOC	Controlled VOC***	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.1	13.0	1.0	0.02	7.5
				(0.10S)		**TOC value		
Potential Emission in tons/yr	0.16	0.55	0.55	0.04	10.27	0.79	0.02	5.92

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Propane Emission Factors shown. Please see AP-42 for butane.
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
See Page 13 for Greenhouse Gas calculations.

Appendix A: Emission Calculations
Press Drying Ovens
Greenhouse Gas

Company Name: Printpack, Inc.
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404
Permit Number: 105-31602-00046
Reviewer: Summer Keown
Date: March 30, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emission in tons/yr	9,873	0.2	0.7
Summed Potential Emissions in tons/yr	9,874		
CO2e Total in tons/yr	10,097		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.

Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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 Potential Emission ton/yr x N2O GWP (310).

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: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

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 Total Emissions (lbs/yr)	VOC Total 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 withdrawl and standing losses using US EPA TANKS Version 4.09 program

Appendix A: Emissions Calculations
Parts Washer (PW01)

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

Wash Solution Tank	300	Gallons
Solution Life	8	Weeks
Solution Changes	6.5	Per Year
Dilution in Tank	0.5	50/50 Wash Solution and Water
Wash Solution Per Year	975	Gallons
VOC in Wash Solution	55.0%	
VOC Per Year	536.25	Gallons
VOC Density	9.3	Lbs/gal
VOC Emissions	**4987.1**	**Lbs/Yr**
	2.5	**Tons/Yr**

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

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

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
Total	21.474

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
21.5	1000	188.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.18	0.71	0.71	0.06	9.41	0.52	7.90

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 17 for HAPs emissions calculations.

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

Company Name: **Printpack, Inc.**
Address City IN Zip: **2121 N. Angelina Lane, Bloomington, IN 47404**
Permit Number: **105-31602-00046**
Reviewer: **Summer Keown**
Date: **March 30, 2012**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.975E-04	1.129E-04	7.054E-03	1.693E-01	3.198E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.703E-05	1.035E-04	1.317E-04	3.574E-05	1.975E-04	0.18

Methodology is the same as page 16.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 18 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Greenhouse Gas Emissions

Company Name: Printpack, Inc.
Address City IN Zip: 2121 N. Angelina Lane, Bloomington, IN 47404
Permit Number: 105-31602-00046
Reviewer: Summer Keown
Date: March 30, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	11,287	0.2	0.2
Summed Potential Emissions in tons/yr	11,287		
CO2e Total in tons/yr	11,355		

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.
Global 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 Potential Emission ton/yr x N2O GWP (310).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

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

DATE: June 6, 2012

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

SUBJECT: Final Decision
Significant Permit Revision
105-31602-00046

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

June 6, 2012

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: 105-31602-00046

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 6/6/2012 Printpack, Inc. 105-31602-00046 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		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											
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