



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: September 12, 2012

RE: Chesapeake Pharmaceutical / 163-32053-00183

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Chesapeake Pharmaceutical and Healthcare Packaging
15220 Foundation Ave.
Evansville, Indiana 47725

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

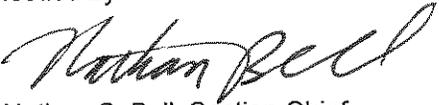
Operation Permit No.: M163-32053-00183	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 12, 2012 Expiration Date: September 12, 2022

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary offset lithographic printing operation and a flexographic printing operation.

Source Address:	15220 Foundation Ave., Evansville, Indiana 47725
General Source Phone Number:	812-492-8517
SIC Code:	2752 (Commercial Printing, Lithographic); 2759 (Commercial Printing, Not Elsewhere Classified)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

(a) The lithographic printing presses:

- (1) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, constructed in 2007, exhausting to stack EF-8.
- (2) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P08, constructed in 2012, with a maximum print width of 3.3 inches, a maximum line speed of 389 feet per minute, exhausting inside the building.
- (3) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P07, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 10,000 sheets per hour, constructed in 2011, exhausting inside the building.

(b) The flexographic printing presses:

- (1) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (2) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.

- (3) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station
- (c) Natural gas-fired heaters:
- (1) Two (2) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.04 MMBtu per hour and constructed in 2007.
 - (2) One (1) natural gas fired HVAC heater, with a maximum heat input capacity of 0.06 MMBtu per hour and constructed in 2007.
 - (3) Two (2) natural gas fired HVAC heater, each with a maximum heat input capacity of 0.13 MMBtu per hour and constructed in 2007.
 - (4) Two (2) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.35 MMBtu per hour and constructed in 2007.
 - (5) One (1) natural gas fired HVAC heater with a maximum heat input capacity of 0.25 MMBtu per hour and constructed in 2007.
 - (6) One (1) natural gas fired HVAC heater with a maximum heat input capacity of 0.20 MMBtu per hour and constructed in 2007.
 - (7) Eight (8) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.40 MMBtu per hour and constructed in 2007.
 - (8) One (1) water heater with a maximum heat input capacity of 0.07 MMBtu per hour and constructed in 2007.
- (d) Vessels storing hydraulic oils, lubricating oils, machining oils, and machining fluids, each with a maximum storage capacity of 55 gallons.
- (e) Emission units with the potential to emit less than five (5) pounds per hour or twenty-five (25) pounds per day of PM₁₀, NO_x, and SO_x, less than twenty-five (25) pounds per day of CO, less than three (3) pounds per hour or fifteen (15) pounds per day of VOC including the following: one (1) Heidelberg Platen Press used for paper slitting, scoring, and folding, with a maximum sheet size of 22" x 30", constructed in 2007, exhausting inside the building.
- (f) One (1) corona treater, constructed in 2012, treats top coats paper, film, etc. at the press prior to ink, using an electric charge that allows the paper, film, etc. to accept the ink properly. Air emissions from the corona treater are limited to ozone emissions.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M163-32053-00183, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M163-32053-00183 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) The lithographic printing presses:
 - (1) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, constructed in 2007, exhausting to stack EF-8.
 - (2) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P08, constructed in 2012, with a maximum print width of 3.3 inches, a maximum line speed of 389 feet per minute, exhausting inside the building.
 - (3) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P07, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 10,000 sheets per hour, constructed in 2011, exhausting inside the building.
- (b) The flexographic printing presses:
 - (1) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
 - (2) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
 - (3) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (c) Natural gas-fired heaters:
 - (8) One (1) water heater with a maximum heat input capacity of 0.07 MMBtu per hour and constructed in 2007.

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations for Paper Coating Operations [326 IAC 8-2-5]

Persuant to 326 IAC 8-2-5, discharge into the atmosphere of any VOC from P01, P08, and P07 shall not exceed 2.9 pounds per gallon of ink or coating.

D.1.2 Volatile Organic Compounds (VOC) Limitations for Graphic Art Operations [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphic Art Operations), the ink, as applied to the substrate, that is used in P04, P05, and P06, shall not exceed a VOC content of 0.5 pounds of

VOCs per pound of solids in the ink.

- (b) Pursuant to 326 IAC 8-5-5(f), work practices shall be used 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 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the one (1) natural gas-fired hot water heater shall not emit particulate matter greater than 0.6 pounds per MMBtu heat input.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 and Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1 and Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1 and Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Chesapeake Pharmaceutical and Healthcare Packaging
Address:	15220 Foundation Ave.
City:	Evansville, Indiana 47725
Phone #:	812-492-8517
MSOP #:	M163-32053-00183

I hereby certify that Chesapeake Pharmaceutical and Healthcare Packaging is :

still in operation.

I hereby certify that Chesapeake Pharmaceutical and Healthcare Packaging is :

no longer in operation.

in compliance with the requirements of MSOP M163-32053-00183.

not in compliance with the requirements of MSOP M163-32053-00183.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Chesapeake Pharmaceutical and Healthcare Packaging
Source Location:	15220 Foundation Ave., Evansville, IN 47725
County:	Vanderburgh
SIC Code:	2752 (Commercial Printing, Lithographic) 2759 (Commercial Printing, Not Elsewhere Classified)
Permit Renewal No.:	M163-32053-00183
Permit Reviewer:	Brian Wright

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Chesapeake Pharmaceutical and Healthcare Packaging to the continued operation of a stationary offset lithographic printing operation and a flexographic printing operation. On June 27, 2012 Chesapeake Pharmaceutical and Healthcare Packaging submitted an application to the OAQ requesting to renew its operating permit. Chesapeake Pharmaceutical and Healthcare Packaging was issued a MSOP (M163-24931-00183) on October 25, 2007. Two notice-only changes have been completed for this permit. This is the first renewal for this source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) The lithographic printing presses:

- (1) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, constructed in 2007, exhausting to stack EF-8.
- (2) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P08, constructed in 2012, with a maximum print width of 3.3 inches, a maximum line speed of 389 feet per minute, exhausting inside the building.
- (3) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P07, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 10,000 sheets per hour, constructed in 2011, exhausting inside the building.

(b) The flexographic printing presses:

- (1) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (2) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, constructed

- in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (3) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, constructed in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station
- (c) Natural gas-fired heaters:
- (1) Two (2) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.04 MMBtu per hour and constructed in 2007.
- (2) One (1) natural gas fired HVAC heater, with a maximum heat input capacity of 0.06 MMBtu per hour and constructed in 2007.
- (3) Two (2) natural gas fired HVAC heater, each with a maximum heat input capacity of 0.13 MMBtu per hour and constructed in 2007.
- (4) Two (2) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.35 MMBtu per hour and constructed in 2007.
- (5) One (1) natural gas fired HVAC heater with a maximum heat input capacity of 0.25 MMBtu per hour and constructed in 2007.
- (6) One (1) natural gas fired HVAC heater with a maximum heat input capacity of 0.20 MMBtu per hour and constructed in 2007.
- (7) Eight (8) natural gas fired HVAC heaters, each with a maximum heat input capacity of 0.40 MMBtu per hour and constructed in 2007.
- (8) One (1) water heater with a maximum heat input capacity of 0.07 MMBtu per hour and constructed in 2007.
- (d) Vessels storing hydraulic oils, lubricating oils, machining oils, and machining fluids, each with a maximum storage capacity of 55 gallons.
- (e) Emission units with the potential to emit less than five (5) pounds per hour or twenty-five (25) pounds per day of PM₁₀, NO_x, and SO_x, less than twenty-five (25) pounds per day of CO, less than three (3) pounds per hour or fifteen (15) pounds per day of VOC including the following: one (1) Heidelberg Platen Press used for paper slitting, scoring, and folding, with a maximum sheet size of 22" x 30", constructed in 2007, exhausting inside the building.
- (f) One (1) corona treater, constructed in 2012, treats top coats paper, film, etc. at the press prior to ink, using an electric charge that allows the paper, film, etc. to accept the ink properly. Air emissions from the corona treater are limited to ozone emissions.

Existing Approvals

Since the issuance of the MSOP No. M163-24931-00183 on October 25, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. 163-30546-00183 issued on June 22, 2011; and
- (b) Notice-Only Change No. 163-31475-00183 issued on March 1, 2012.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, 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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.
Unclassifiable or attainment effective October 27, 2011, for PM2.5.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Vanderburgh County has been classified as attainment for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 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 PM2.5 significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM2.5 and SO2 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**
Vanderburgh 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	0.04
PM10	0.16
PM2.5	0.16
SO2	0.01
VOC	71.38
CO	1.74
NOx	2.07
GHGs as CO2e	2499
Worst Single HAP	7.13 (Butoxyethanol/Glycol Ether)
Total HAPs	11.53

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (b) The requirements of the New Source Performance Standard (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not

- included in the permit, since the printing presses at this source are not rotogravure printing presses.
- (c) The requirements of the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (60.440 to 60.447) (326 IAC 12), are not included in this permit, because this source does not manufacture pressure sensitive tape and label materials.
 - (d) The requirements of the New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing Source (40 CFR 60, Subpart FFF) (326 IAC 12) are not included in the permit, since this source does not have any rotogravure printing presses used to print or coat flexible vinyl or urethane products.
 - (e) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (60.740 to 60.748) (326 IAC 12), are not included in this permit, because the source does not perform polymeric coating of supporting substrates, defined as web coating process that apply elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil (40 CFR 60.741).
 - (f) The requirements of the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (60.110b through 60.117b) (326 IAC 12), are not included in the permit, because each of the storage vessels at this source has a capacity less than seventy-five (75) cubic meters (m3) (19,813 gallons).
 - (g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Halogenated Solvent Cleaning, (40 CFR 63, Subpart T) (326 IAC 20-6), are not included in the permit because the solvent utilized at this source does not contain any of the halogenated compounds listed in 40 CFR 63.460(a).
- (i) 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.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, (40 CFR 63, Subpart JJJJ) (326 IAC 20-65), are not included in the permit for the flexographic presses (Presses P04, P05, and P06), which are considered web coating lines as defined by 40 CFR 63.3310, because this source is not a major source of hazardous air pollutants (HAPs). The requirements of 40 CFR 63, Subpart JJJJ, are not included for the sheetfed offset lithographic printing presses (Presses P01, P08, and P07), since this source is not a major source of HAPs and these presses are not considered web coating lines as defined by 40 CFR 63.3310.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (326 IAC 20-77) are not included in the permit because the source does not print, coat, or dye fabric or other textiles as defined in 40 CFR 63.4371 and is not a major source of HAPs.
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability - Entire Source

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

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 6.5 (PM Limitations Except Lake County)

This source is not subject to 326 IAC 6.5 because it does not have the potential to emit particulate matter equal to or greater than 10 tons per year.

326 IAC 6-8 (PM Limitations for Lake County)

This source is not subject to 326 IAC 6.8 because it is not located in Lake County and it does not have the potential to emit particulate matter equal to or greater than 10 tons per year.

State Rule Applicability – Individual Facilities

Printing Presses

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

The six (6) printing presses (P01, P04, P05, P06, P07, and P08) are not subject to 326 IAC 6-3-2, because the six (6) printing presses (P01, P04, P05, P06, P07, and P08) are not sources of particulate emissions.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The printing presses (P01 through P06) were constructed after January 1, 1980; however, each press is subject to another Article 8 rule. The lithographic presses (P01, P07, and P08) are subject to the requirements of 326 IAC 8-2-5, and the flexographic printing presses (P04, P05, and P06) are subject to 326 IAC 8-5-5. Therefore, these presses are not subject to the requirements of 326 IAC 8-1-6.

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

The printing presses were constructed in Vanderburgh County after July 1, 1990. The flexographic printing presses (identified as P04, P05, and P06) do not have actual emissions of greater than fifteen (15) pounds of VOC per day; therefore, the flexographic presses are not subject to the requirements of 326 IAC 8-2. The lithographic presses (identified as P01, P07, and P08) have actual emissions of greater than fifteen (15) pounds of VOC per day and apply surface coating materials to paper; therefore, the lithographic presses are subject to the requirements of 326 IAC 8-2-5. Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line. Based on the Material Safety Data Sheets (MSDS) provided by the source for the coatings and inks used in P01, P02, and P03, this source are able to comply with 326 IAC 8-2-5.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This source was constructed in Vanderburgh County after July 1, 1990, and will perform organic solvent degreasing activities. However, all of the solvents used at this source will be applied either manually or automatically at the printing presses. There are no cold cleaners, open top vapor degreasers, or conveyORIZED degreasers at this source. Therefore, there are no applicable requirements under 326 IAC 8-3.

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

This source was constructed after November 1, 1980, in Vanderburgh County, and the source has the potential to emit greater than twenty-five (25) tons of VOC per year. Therefore, the flexographic printing lines are subject to the requirements of 326 IAC 8-5-5. Pursuant to 326 IAC 8-5-5(c), the Permittee shall not cause, allow, or permit the operation of the flexographic printing lines unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
- (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.

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

This source is not subject to 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing), because this source is not located in Lake or Porter County. This source is located in Vanderburgh County.

Natural Gas Combustion

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

- (a) The seventeen (17) natural gas-fired heaters are not subject to the requirements of 326 IAC 6-2, because none of these emission units are sources of indirect heating.
- (b) The one (1) natural gas-fired hot water heater with a maximum heat input of 0.07 MMBtu per hour is subject to the requirements of 326 IAC 6-2-4 because operation began after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the following indirect heating facilities shall be limited to the following:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

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

Pursuant to 326 IAC 6-2-4, the one (1) natural gas-fired hot water heater shall not emit particulate matter greater than 0.6 pounds per MMBtu heat input.

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

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

Each of the natural gas-fired HVAC heaters and the water heater is not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, each of the natural gas-fired HVAC heaters and the water heater is not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

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

Each of the natural gas-fired HVAC heaters and the water heater is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Platen Press

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

The Platen Press is expected to have negligible particulate emissions (less than 0.551 pounds per hour). Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply to the

Platen Press because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the Platen Press is not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

326 IAC 8 (Volatile Organic Compound Rules)

There are no materials containing VOCs used in the Platen Press (this press is not able to perform printing or coating operations). This press is only used for cutting, slitting, scoring, and folding of paper. Therefore, there are no VOC emissions from this unit and the unit is not subject to any rules under 326 IAC 8.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 27, 2012.

Conclusion

The operation of this stationary offset lithographic printing operation and a flexographic printing operation shall be subject to the conditions of the attached MSOP Renewal No. M163-32053-00183.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 243-6544 or toll free at 1-800-451-6027.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
Emission Summary**

Company Name: Chesapeake Pharmaceutical and Healthcare Packaging
Source Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP Renewal No.: M163-32053-00183
Reviewer: Brian Wright
Date: July 2012

Unlimited Potential to Emit (tons/yr)

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	TOTAL HAPs	Worst Single HAP
Lithographic Presses	0.00	0.00	0.00	0.00	0.00	13.57	0.00	0.00	0.00	--
Flexographic Presses	0.00	0.00	0.00	0.00	0.00	6.45	0.00	0.00	0.27	Glycol Ether
Fountain Solution/Cleaners	0.00	0.00	0.00	0.00	0.00	51.50	0.00	0.00	11.22	Butoxyethanol/Glycol Ether
Platen Press*	Negligible	Negligible	Negligible	0.00	0.00	0.00	0.00	0.00	0.00	--
Natural Gas Combustion	0.04	0.16	0.16	0.01	2.07	0.11	1.74	2,499	0.04	Hexane
Total	0.04	0.16	0.16	0.01	2.07	71.64	1.74	2,499	11.53	7.13 Butoxyethanol/Glycol Ether

*The platen press is used for paper slitting, scoring, and folding and is expected to have negligible PM/PM10/PM2.5 emissions.

Appendix A: Emission Calculations
VOC Emissions From Printing and Cleaning Cycles

Company Name: Chesapeake Pharmaceutical and Healthcare Packaging
Source Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP Renewal No.: M163-32053-00183
Reviewer: Brian Wright
Date: July 2012

According to information provided by the source, this source will spend six (6) hours per 8-hour shift in a printing cycle. The remaining two (2) hours per 8-hour shift will be used for a cleaning cycle. The printing cycles and cleaning cycles cannot occur simultaneously. The fountain solution can be run simultaneously with the lithographic printing presses. The worst case emission calculations below assume that there will be three (3) 8-hour shifts per day and 365 days per year, for a total of 8,760 hours per year.

1. Printing Cycle: 6,570 hrs/yr

Lithographic Press Emission Unit ID	Maximum Sheet Size (in ² /sheet)	Maximum Line Speed (sheets/hr)	Number of Print Decks	Maximum Ink Coverage per Print Deck (lbs of ink/in ²)	Maximum Coating Coverage per Print Deck (lbs of coating/in ²)	Worst Case Ink Weight % VOC	Worst Case Coating Weight % VOC	VOC Retention Factor for Ink (%)	PTE VOC (tons/yr) from Ink	PTE VOC (tons/yr) from Coating	Total PTE VOC (tons/yr)
P01	1120	11,000	6	3.14E-06	6.20E-07	21.0%	3.80%	95.0%	8.00	0.95	8.95
P07	1120	10,000	2	3.14E-06	N/A	21.0%	N/A	95.0%	2.42	N/A	2.42
P08	450.00	15000	3	3.14E-06	N/A	21.00%	3.96%	95.0%	2.19	N/A	2.19
Total									12.62	0.95	13.6

Flexographic Press Emission Unit ID	Maximum Print Width (in)	Maximum Line Speed (ft/min)	Number of Print Decks	Maximum Ink Coverage per Print Deck (lbs of ink/ft length)	Maximum Coating Coverage per Print Deck (lbs of coating/ft length)	Worst Case Ink Weight % VOC	Worst Case Coating Weight % VOC	PTE VOC (tons/yr) from Ink	PTE VOC (tons/yr) from Coating	Total PTE VOC (tons/yr)	
P04	7.00	450	1	0.00028	0.00018	5.00%	3.96%	1.24	0.63	1.87	
P05	7.00	500	1	0.00028	0.00018	5.00%	3.96%	1.38	0.70	2.08	
P06	16.0	600	1	0.00028	0.00018	5.00%	3.96%	1.66	0.84	2.50	
Total									4.28	2.18	6.45

Emission Units	Material	Total Maximum Usage (gal/hr)	Pounds VOC per Gallon of Mat.	PTE VOC (tons/yr)
P01 and P07	Fountain Solution	0.31	6.52	6.69

The fountain solution is used to prep the equipment for printing and can be run simultaneously with the lithographic printing presses.

Methodology

PTE VOC (tons/yr) (P01 and P03 - ink) = Max Sheet Size (in²/sheet) x Max Line Speed (sheets/hr) x Number of Print Decks x Max Ink Coverage per Print Deck (lbs/in²) x Worst Case Ink Weight % VOC x (1-VOC Retention Factor %) x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P01 and P03 - coating) = Max Sheet Size (in²/sheet) x Max Line Speed (sheets/hr) x Number of Print Decks x Max Coating Coverage per Print Deck (lbs/in²) x Worst Case Coating Weight % VOC x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P04 through P06, and P08 - ink) = Max Line Speed (ft/min) x Number of Print Decks x Max Ink Coverage per Print Deck (lbs/ft) x Worst Case Ink Weight % VOC x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P04 through P06 - coating) = Max Line Speed (ft/min) x Number of Print Decks x Max Coating Coverage per Print Deck (lbs/ft) x Worst Case Coating Weight % VOC x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (Fountain Solution) = Maximum Usage (gal/hr) x Pounds VOC per Gallon of Mat. (lbs/gal) x 6,570 hrs/yr x 1 ton/2,000 lbs

2. Cleaning Cycle: 2,190 hrs/yr

Emission Units	Material	Maximum Usage (gal/hr)	Hours per Day (hrs/day)*	Pounds VOC per Gallon of Mat.	PTE VOC (tons/yr)
P01, P07 and P08	Blanket/Roller Wash Pressmax 90A0	5.50	6.00	6.65	40.05
P01, P07 and P08	Roller Wash Step R001	0.52	6.00	4.25	2.40
P01, P07 and P08	Peerless Back Cylinder Cleaner	0.22	6.00	2.96	0.71
P01, P07 and P08	Enviro Meter Cleaner	0.13	6.00	8.75	1.23
P04 through P06	Rubber Rejuvenator	0.05	6.00	7.58	0.42
Total					44.80

Methodology

PTE VOC (tons/yr) = Maximum Usage (gal/hr) x Pounds VOC per Gallon of Mat. (lbs/gal) x 2,190 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
HAP Emissions From Printing and Cleaning Cycles**

**Company Name: Chesapeake Pharmaceutical and Healthcare Packaging
Source Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP Renewal No.: M163-32053-00183
Reviewer: Brian Wright
Date: July 2012**

According to information provided by the source, this source will spend six (6) hours per 8-hour shift in a printing cycle. The remaining two (2) hours per 8-hour shift will be used for a cleaning cycle. The printing cycles and cleaning cycles cannot occur simultaneously. The fountain solution can be run simultaneously with the lithographic printing presses. The worst case emission calculations below assume that there will be three (3) 8-hour shifts per day and 365 days per year, for a total of 8,760 hours per year.

1. Printing Cycle: 6,570 hrs/yr

Emission Unit ID	Maximum Print Width (in)	Maximum Line Speed (ft/min)	Number of Print Decks	Maximum Coating Coverage per Print Deck (lbs of coating/ft)	Worst Case Coating Weight % Glycol Ether	PTE Glycol Ether (tons/yr)
P04	7.00	450	1	0.00018	0.50%	0.08
P05	7.00	500	1	0.00018	0.50%	0.09
P06	16.0	600	1	0.00018	0.50%	0.11
Total						0.27

The coatings and inks used in P01, P02, and P03 do not contain any HAPs.
The inks used in P04, P05, and P06 do not contain any HAPs.

Material	Density (lbs/gal)	Total Maximum Usage (gal/hr)	Weight % 2-Butoxyethanol	PTE 2-Butoxyethanol (tons/yr)
Fountain Solution	7.76	0.31	85.0%	6.77

The fountain solution is used to prep the equipment for printing and can be run simultaneously with the lithographic printing presses.

Methodology

PTE HAP (tons/yr) (P04 through P06) = Maximum Line Speed (ft/min) x Maximum Coating Coverage per Print Deck (lbs of coating/ft) x Weight % HAP x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs
PTE HAP (tons/yr) (Fountain Solution) = Maximum Usage (gal/hr) x Density (lbs/gal) x Weight % HAP x 6,570 hrs/yr x 1 ton/2,000 lbs

2. Cleaning Cycle: 2,190 hrs/yr

Emission Units	Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Cumene	Weight % Xylene	Weight % Trichloroethylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Glycol Ethers	PTE Cumene (tons/yr)	PTE Xylene (tons/yr)	PTE Trichloroethylene (tons/yr)	PTE Toluene (tons/yr)	PTE Methyl Isobutyl Ketone (tons/yr)	PTE Glycol Ethers (tons/yr)
P01, P07 and P08	Blanket/Roller Wash Pressmax 90A0	6.84	5.50	5.0%	5.0%	0.0%	0.0%	0.0%	0.0%	2.06	2.06	0.00	0.00	0.00	0.00
P04 through P06	Rubber Rejuvenator	7.58	0.05	0.0%	0.0%	30.0%	20.0%	10.0%	20.0%	0.00	0.00	0.13	0.08	0.04	0.08
Total										2.06	2.06	0.13	0.08	0.04	0.08

The Enviro Meter Cleaner, Peerless Back Cylinder Cleaner, and the Roller Wash Step R001 do not contain any HAPs.

Methodology

PTE HAP (tons/yr) = Density (lbs/gal) x Maximum Usage (gal/hr) x Weight % HAP x 2,190 hrs/yr x 1 ton/2,000 lbs

Total HAPs	4.45
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**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion**

**Company Name: Chesapeake Pharmaceutical and Healthcare Packaging
Source Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP Renewal No.: M163-32053-00183
Reviewer: Brian Wright
Date: July 2012**

Heat Input Capacity MMBtu/hr	Potential Throughput MMSCF/yr
4.82	41.4

Pollutant	Pollutant						
	PM*	PM10*	PM2.5*	SO ₂	NOx**	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	0.04	0.16	0.16	0.01	2.07	0.11	1.74

*PM emission factor is filterable PM only. PM10/PM2.5 emission factors are filterable and condensable combined.

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

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

Hazardous Air Pollutants (HAPs)

Pollutant	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential to Emit (tons/yr)	4.35E-05	2.48E-05	1.55E-03	3.73E-02	7.04E-05

Pollutant	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential to Emit (tons/yr)	1.03E-05	2.28E-05	2.90E-05	7.87E-06	4.35E-05
TOTAL HAPs					0.04

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Greenhouse Gases (GHGs)

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,484	0.0	0.0
Summed Potential Emissions in tons/yr	2,484		
CO ₂ e Total in tons/yr	2,499		

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



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: John Miles
Chesapeake Pharmaceutical and Healthcare Packaging
15220 Foundation Avenue
Evansville, IN 47725

DATE: September 12, 2012

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

SUBJECT: Final Decision
MSOP
163-32053-00183

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



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Toll Free (800) 451-6027
www.idem.IN.gov

TO: Evansville Vanderburgh Public Library

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

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

Applicant Name: Chesapeake Pharmaceutical
Permit Number: 163-32053-00183

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	DPABST 9/12/2012 Chesapeake Pharmaceutical and Healthcare Packaging 163-32053-00183 (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	

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1		John Miles Chesapeake Pharmaceutical and Healthcare Packaging 15220 Foundation Ave Evansville IN 47725 (Source CAATS) (CONFIRM DELIVERY)										
2		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 (Library)										
5		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
7		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
8		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
9		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
11		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
12		Pete DeRossi & Heather Wattenbach Foth Infrastructure & Environment, LLC 2737 South Ridge Road, Suite 600 PO Box 12326 Green Bay WI 54307 (Consultant)										
13		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
14												
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