



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 2, 2013

RE: Multi Packaging Solutions - Indiana / 097 - 33104 - 00401

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

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

May 2, 2013

Patrick Peak  
Multi Packaging Solutions - Indiana  
2020 Production Drive  
Indianapolis, IN 46241

Re: 097-33104-00401  
First Administrative Amendment to  
MSOP No.: 097-32239-00401

Dear Mr. Peak:

Multi Packaging Solutions was issued a Minor Source Operating Permit (MSOP) Renewal No.: M097-32239-00401 on November 20, 2012 for a stationary printing operation located at 2020 Production Drive, Indianapolis, Indiana. An application requesting changes to the permit was received on April 22, 2013.

The application includes information relating to the construction and operation of one (1) new lithographic printing press (K7) that is of the same type as the existing permitted lithographic printing presses. The new printing press will replace one existing printing press (K3). The new printing press will comply with the same applicable requirements and permit terms and conditions as the existing printing presses, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The increase in potential VOC emissions due to the replacement of the new printing press is less than ten (10) tons per year. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. Adding the new printing press to the permit is considered an Administrative Amendment pursuant to 326 IAC 2-6.1-6(d)(8).

The federal rule applicability for this Administrative Amendment is as follows:

### New Source Performance Standards (NSPS)

- (a) 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.
- (b) 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.
- (c) 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.
- (d) 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).

- (e) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this Administrative Amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) 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).
- (b) The requirements for the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (326 IAC 20-18), are not included in this permit, because this source does not contain rotogravure or wide-web flexographic printing presses and this source is not a major source of HAPs.
- (c) 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 since this source is not a major source of HAPs.
- (d) 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.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

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

Pursuant to the provisions of 326 IAC 2-6.1-6, the changes listed below have been made to Minor Source Operating Permit No.: M097-32239-00401. Deleted language appears as ~~strikeouts~~ and new language appears in **bold**:

A.2 Emission Units and Pollution Control Equipment Summary

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

- ~~(a) One (1) Komori, LS640 6 Color Sheetfeed Offset Lithographic Press, identified as K3, installed in 2005, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.~~
- (ab) One (1) Komori, LS40 8 Color Sheetfeed Offset Lithographic Press, identified as K4, installed in 2006, with a maximum line speed of 627.76 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (be) One (1) Sheet-fed Offset Lithographic Press, identified as K5, approved for construction in 2012, with a maximum line speed of 588.54 feet per minute, and a maximum printing width of 40.5 inches, exhausting indoors.
- (cd) One (1) Sheet-fed Offset Lithographic Press, identified as K6, approved for construction in 2012, with a maximum line speed of 604.2 feet per minute, and a maximum printing width of 41 inches, exhausting indoors.
- (d) **One (1) Sheet-fed Offset Lithographic Press, identified as K7, approved in 2013 for**

**construction, with a maximum line speed of 725.0 feet per minute, and a maximum printing width of 41 inches, exhausting indoors.**

...  
The Organic Solvent Degreasing Operations (326 IAC 8-3) rules have been updated Effective 3/1/2013. This source owns and operates cold cleaner degreaser equipment, therefore Condition D.1.1 is updated as follows:

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

**~~D.1.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]~~**

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

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

**D.1.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]**

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:**
  - (1) Equip the degreaser with a cover.**
  - (2) Equip the degreaser with a device for draining cleaned parts.**
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser**
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.**
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).**
  - (6) Store waste solvent only in closed containers.**
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:**

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.**
  - (C) A refrigerated chiller.**
  - (D) Carbon adsorption.**
  - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
- (3) If used, solvent spray:**
  - (A) must be a solid, fluid stream; and**
  - (B) shall be applied at a pressure that does not cause excessive splashing.**

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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 Swarna Prabha, of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376.

Sincerely,



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

Attachments: Updated Permit

SP/CAW

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



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

**Minor Source Operating Permit Renewal  
OFFICE OF AIR QUALITY**

**Multi Packaging Solutions - Indiana  
2020 Production Dr.  
Indianapolis, Indiana 46241**

(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.: M097-32239-00401	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 15, 2013  Expiration Date: January 15, 2018

First Administrative Amendment No. 097-33104-00401	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 2, 2013  Expiration Date: January 15, 2018

## TABLE OF CONTENTS

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

<b>D.1. EMISSIONS UNIT OPERATION CONDITIONS</b> .....	17
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.1.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]	
<b>D.2. EMISSIONS UNIT OPERATION CONDITIONS</b> .....	18
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
D.2.1 Particulate [326 IAC 6-3-2]	
Annual Notification .....	19
Malfunction Report .....	20

## 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 printing operation.

Source Address:	2020 Production Dr., Indianapolis, Indiana 46241
General Source Phone Number:	317-241-2020
SIC Code:	2752 (Commerical Printing, Lithographic)
County Location:	Marion
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) One (1) Komori, LS40 8 Color Sheetfeed Offset Lithographic Press, identified as K4, installed in 2006, with a maximum line speed of 627.76 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Sheet-fed Offset Lithographic Press, identified as K5, approved for construction in 2012, with a maximum line speed of 588.54 feet per minute, and a maximum printing width of 40.5 inches, exhausting indoors.
- (c) One (1) Sheet-fed Offset Lithographic Press, identified as K6, approved for construction in 2012, with a maximum line speed of 604.2 feet per minute, and a maximum printing width of 41 inches, exhausting indoors.
- (d) One (1) Sheet-fed Offset Lithographic Press, identified as K7, approved for construction in 2013, with a maximum line speed of 725.0 feet per minute, and a maximum printing width of 41 inches, exhausting indoors.

- (e) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:

Unit description	Maximum Heat Input Capacity (MMBtu/hr)	Number of Units	Combined Maximum Heat Input Capacity (MMBtu/hr)	Potential Natural Gas Usage (scf/hr)
Natural gas fired comfort heat units	0.231	8	1.848	1848
Natural gas fired comfort heat units	0.154	10	1.540	1540
Natural gas fired comfort heat units	0.08	2	0.160	160
Natural gas fired comfort heat units	0.30	1	0.300	300
	Total	21	3.848	3848

- (f) Cold cleaning dip tanks throughout the source, identified as Emission Unit ID Cold Cleaner, with a maximum annual consumption of mineral spirits of 855 gallons per year, each equipped with remote solvent reservoirs. [326 IAC 8-3-2]
- (g) One (1) trim waste collection system, identified as T1, constructed in 2008 and approved for modification in 2009, with a maximum capacity of 12,000 pounds of trim waste per hour, using a cyclone as control, and exhausting to one (1) stack. The trim system has a maximum design capacity of 12,000 pounds of scrap per hour; however, die cutters feeding the trim system have a maximum scrap output capacity of 1,284 pounds per hour, resulting in a bottleneck. Therefore, the total hourly rate at the trim system cannot exceed 1,284 pounds of scrap per hour. The system contains the following units:
- (1) Two (2) die cutters, identified as B1 and B2, constructed in 2008, with a joint maximum capacity of 599.2 pounds per hour.
  - (2) One (1) die cutter, identified as B3, constructed in 2009, with a maximum capacity of 684.8 pounds per hour.

## 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, M097-32239-00401, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

### B.4 Enforceability

---

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

### B.5 Severability

---

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

### B.6 Property Rights or Exclusive Privilege

---

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

### B.7 Duty to Provide Information

---

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

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

---

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

---

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM,

OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M097-32239-00401 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:

- (f) Cold cleaning dip tanks throughout the source, identified as Emission Unit ID Cold Cleaner, with a maximum annual consumption of mineral spirits of 855 gallons per year, each equipped with remote solvent reservoirs. [326 IAC 8-3-2]

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

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the

department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (g) One (1) trim waste collection system, identified as T1, constructed in 2008 and approved for modification in 2009, with a maximum capacity of 12,000 pounds of trim waste per hour, using a cyclone as control, and exhausting to one (1) stack. The trim system has a maximum design capacity of 12,000 pounds of scrap per hour; however, die cutters feeding the trim system have a maximum output of 1,284 pounds of scrap per hour to the system, resulting in a bottleneck. Therefore, the total hourly rate at the trim system cannot exceed 1,284 pounds of scrap per hour. The system contains the following units:
- (1) Two (2) die cutters, identified as B1 and B2, constructed in 2008, with a maximum capacity of 599.2 pounds per hour.
  - (2) One (1) die cutter, identified as B3, constructed in 2009, with a maximum capacity of 684.8 pounds per hour.

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

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

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) trim waste collection system shall not exceed 1.83 pounds per hour when operating at a process weight rate of 1,284 pounds per hour. The pound per hour limitation was calculated using the following equation:

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

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

**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).

<b>Company Name:</b>	Multi Packaging Solutions - Indiana
<b>Address:</b>	2020 Production Dr.
<b>City:</b>	Indianapolis, Indiana 46241
<b>Phone #:</b>	317-241-2020
<b>MSOP #:</b>	M097-32239-00401

I hereby certify that Multi Packaging Solutions - Indian  still in operation.  
is :

no longer in operation.

I hereby certify that Multi Packaging Solutions - Indian  in compliance with the requirements of  
is : MSOP M097-32239-00401.

not in compliance with the requirements of  
MSOP M097-32239-00401.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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:

---

---

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name: Multi Packaging Solutions - Indiana  
Source Address: 2020 Production Drive, Indianapolis, IN 46241  
Administrative Amendment No.: 097-33104-00401  
MSOP No.: 097-32239-00401  
Reviewer: Swarna Prabha  
Date: April 25, 2013**

**Uncontrolled Potential to Emit (tons per year)**

	<b>Emissions Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO<sub>2</sub>e</b>	<b>Total HAPs</b>	<b>Worst Single HAP</b>	
Existing Units	Printing Press K4	0.00	0.00	0.00	0.00	0.00	56.99	0.00	0.00	negl.	negl.	negl.
	Cold Cleaning Dip	0.00	0.00	0.00	0.00	0.00	2.83	0.00	0.00	negl.	negl.	negl.
	Trim Waste Collection System	5.62	5.62	5.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas-Fired Combusion	0.03	0.13	0.13	0.01	1.69	0.09	1.42	2035	0.03	0.03	(hexane)
	Printing Press K5	0.00	0.00	0.00	0.00	0.00	46.36	0.00	0.00	negl.	negl.	negl.
	Printing Press K6	0.00	0.00	0.00	0.00	0.00	64.90	0.00	0.00	negl.	negl.	negl.
<b>New Unit</b>	<b>Printing Press K7</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>21.96</b>	<b>0.00</b>	<b>0.00</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>
Removed unit	Printing Press K3	0.00	0.00	0.00	0.00	0.00	17.1	0.00	0.00	negl.	negl.	negl.
<b>Increase in Potential to Emit</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.86</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Total</b>		<b>5.66</b>	<b>5.75</b>	<b>5.75</b>	<b>0.01</b>	<b>1.69</b>	<b>193.14</b>	<b>1.42</b>	<b>2035</b>	<b>0.03</b>	<b>0.03</b>	<b>(hexane)</b>

NOTE: VOC emissions from Offset Lithographic Printing presses are updated based on the following EPA document.  
Emissions From Offset Lithographic Printing, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit  
Guidance memo, Documentation of Emission Calculations. Tim Smith, USEPA/QA/QPS, April 1998, pages 28-31

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations-K7**

**Company Name: Multi Packaging Solutions - Indiana  
Source Address: 2020 Production Drive, Indianapolis, IN 46241  
Administrative Amendment No.: 097-33104-00401  
MSOP No.: 097-32239-00401  
Reviewer: Swarna Prabha  
Date: April 25, 2013**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
K7	725	41	187482

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Ink (UV)	3.125	0%	80.00%	187482	0.00
Coating	0.5	3.5%	80.00%	187482	1.31
Bottcher UV lite	0.18	100%	100.00%	187482	16.87
Alkaless 3000 FS	0.04	51.2%	80.00%	187482	1.54
3451U FS Additive	0.02	24.3%	80.00%	187482	0.36
Isopropanol Roller Cleaner	0.02	100%	100.00%	187482	1.87

Total VOC Emissions =	<b>21.96 Ton/yr</b>
-----------------------	---------------------

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. NONHEATSET TYPES OF PRINTERS HAVE A FLASH OFF OF 5%.

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Multi Packaging Solutions - Indiana**  
**Source Address: 2020 Production Drive, Indianapolis, IN 46241**  
**Administrative Amendment No.: 097-33104-00401**  
**MSOP No.: 097-32239-00401**  
**Reviewer: Swarna Prabha**  
**Date: April 25, 2013**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
K4	627.78	40.5	160361

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Ink	2.5	24%	80.00%	160361	38.49
Coating	0.5	3.5%	80.00%	160361	1.12
Bottcher 4050 Blanket Wash	0.18	100%	100.00%	160361	14.43
Alkaless 3000 FS	0.04	51.2%	80.00%	160361	1.31
3451U FS Additive	0.002	24.3%	80.00%	160361	0.03
Isopropanol Roller Cleaner	0.02	100%	100.00%	160361	1.60

Total VOC Emissions =	<b>56.99 Ton/yr</b>
-----------------------	---------------------

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. NONHEATSET TYPES OF PRINTERS HAVE A FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Multi Packaging Solutions - Indiana  
Source Address: 2020 Production Drive, Indianapolis, IN 46241  
Administrative Amendment No.: 097-33104-00401  
MSOP No.: 097-32239-00401  
Reviewer: Swarna Prabha  
Date: April 25, 2013**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
K5	588.54	40.5	150338

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Ink	2	24%	80.00%	150338	28.86
Coating	0.5	4%	80.00%	150338	1.20
Bottcher 4050 Blanket Wash	0.18	100%	100.00%	150338	13.53
Alkaless 300 FS	0.04	51%	80.00%	150338	1.23
3451U FS Additive	0.002	24%	80.00%	150338	0.03
Isopropanol Roller Cleaner	0.02	100%	100.00%	150338	1.50

Total VOC Emissions =	<b>46.36 Ton/yr</b>
-----------------------	---------------------

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. NONHEATSET TYPES OF PRINTERS HAVE A FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Multi Packaging Solutions - Indiana**  
**Source Address: 2020 Production Drive, Indianapolis, IN 46241**  
**Administrative Amendment No.: 097-33104-00401**  
**MSOP No.: 097-32239-00401**  
**Reviewer: Swarna Prabha**  
**Date: April 25, 2013**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
K6	604.2	41	156243

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Ink	3.125	24%	80.00%	156243	46.87
Coating	0.5	3.5%	80.00%	156243	1.09
Bottcher UV Lite Blanket Wash	0.18	100%	100.00%	156243	14.06
Alkaless 3000 FS	0.04	51.2%	80.00%	156243	1.28
3451U FS Additive	0.002	24.3%	80.00%	156243	0.03
Isopropanol Roller Cleaner	0.02	100%	100.00%	156243	1.56

Total VOC Emissions =	<b>64.90 Ton/yr</b>
-----------------------	---------------------

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. NONHEATSET TYPES OF PRINTERS HAVE A FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

**Appendix A: Emissions Calculations  
VOC From Parts washer**

**Company Name:** Multi Packaging Solutions - Indiana  
**Source Address:** 2020 Production Drive, Indianapolis, IN 46241  
**Administrative Amendment No.:** 097-33104-00401  
**MSOP No.:** 097-32239-00401  
**Reviewer:** Swarna Prabha  
**Date:** April 25, 2013

**Parts Washer Description:**

One (1) parts washer with 34 gallon capacity of solvent.

**Solvent Data:**

Solvent Name	Manufacturer	Product Density (lb/gal) <sup>(1)</sup>	VOC Content (lb/gal)
Safety-Kleen Premium Gold Solvent	Safety-Kleen	6.6	6.6

**Potential Emissions:**

Max. Annual Solvent Usage [gal/yr] <sup>(2)</sup>	Max. Hourly Solvent Usage	Potential VOC Emissions [lb/hr] <sup>(4)</sup>	Potential VOC Emissions [tpy] <sup>(5)</sup>
855	0.098	0.647	2.83

**Additional Information:**

- (1) Product Density [lb/gal] = Specific Gravity x 8.34 lb/gal = 0.795 x 8.34
- (2) Cornerstone took the typical annual solvent usage (570 gallons) x 150% to estimate a maximum annual solvent usage.
- (3) Max. Hourly Solvent Usage [gal/hr] = Max. Annual Solvent Usage [gal/yr] / 8,760 hr/yr
- (4) Potential VOC Emissions [lb/hr] = Max. Hourly Solvent Usage [gal/hr] x VOC Content [lb/gal]
- (5) Potential VOC Emissions [tpy] = Potential VOC Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations  
PM/PM10 From Trim Collection System**

**Company Name: Multi Packaging Solutions - Indiana**  
**Source Address: 2020 Production Drive, Indianapolis, IN 46241**  
**Administrative Amendment No.: 097-33104-00401**  
**MSOP No.: 097-32239-00401**  
**Reviewer: Swarna Prabha**  
**Date: April 25, 2013**

**Particulate Matter Emissions**

Scrap Collection System

Number of Die Cutters	Emissions Unit ID	Run Speed (IPH)	Scrap (lb/sheet)	Scrap (lb/hr)	Emission Factor (wt %)	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tpy)	Control Efficiency	Controlled PTE (tpy)
2	B1 and B2	3500	0.0856	599.2	0.10%	0.599	2.62	90%	0.262
1	B3	8000	0.0856	684.8	0.10%	0.685	3.00	90%	0.300
<b>Total</b>						<b>1.284</b>	<b>5.62</b>		<b>0.562</b>

**Notes**

Emission factor is the weight percent scrap considered as PM

EF is from MSOP 107-17679-00060

\*\* IPH = Impressions per Hour

Primary sheet gauge is 0.018, which has a density of 0.428 lbs/sheet

A 20% scrap rate generates 0.0856 lbs scrap/sheet

Scrap (lb/hr) = # of Die Cutters x Run Speed (IPH) x lb scrap/sheet

PTE (lb/hr) = lb scrap/hr x Emission Factor (wt %)

PTE (tpy) = PTE (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

PM is assumed to be equal to PM10 and PM2.5.

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

**Company Name:** Multi Packaging Solutions - Indiana  
**Source Address:** 2020 Production Drive, Indianapolis, IN 46241  
**Administrative Amendment No.:** 097-33104-00401  
**MSOP No.:** 097-32239-00401  
**Reviewer:** Swarna Prabha  
**Date:** April 25, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Unit description	Max Heat input	Number of Units	Combined Max
3.848	1000	33.7	Natural gas fired comfort heat units	0.231	8	1.848
			Natural gas fired comfort heat units	0.154	10	1.540
			Natural gas fired comfort heat units	0.080	2	0.160
			Natural gas fired comfort heat units	0.300	1	0.300
			<b>Total</b>		<b>21</b>	<b>3.848</b>

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.03	0.13	0.13	0.01	1.69	0.09	1.42

\*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.539E-05	2.023E-05	1.264E-03	3.034E-02	5.730E-05

Emission Factor in lb/MMcf	HAPs - Metals					Total HAPs
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.427E-06	1.854E-05	2.360E-05	6.405E-06	3.539E-05	0.03

**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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name:** Multi Packaging Solutions - Indiana  
**Source Address:** 2020 Production Drive, Indianapolis, IN 46241  
**Administrative Amendment No.:** 097-33104-00401  
**Reviewer:** Swarna Prabha  
**Date:** April 25, 2013

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,023	0.0	0.0
Summed Potential Emissions in tons/yr	2,023		
CO2e Total in tons/yr	2,035		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2 lb/MMcf. The N2O Emission Factor for low Nox burner is 0.64lb/MMcf. 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.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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

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

TO: Patrick Peak  
Multi Packaging Solutions - Indiana  
4325 Shepherdsville Rd  
Louisville, KY 40218

DATE: May 2, 2013

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

SUBJECT: Final Decision  
MSOP - Administrative Amendment  
097 - 33104 - 00401

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:  
Matt Dickman, Regional Ops Dir  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	LPOGOST 5/2/2013 Multi Packaging Solutions - Indiana 097 - 33104 - 00401 /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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Patrick Peak Multi Packaging Solutions - Indiana 4325 Shepherdsville Rd Louisville KY 40218 (Source CAATS) Via confirmed delivery									
2		Matt Dickman Regional Ops Dir Multi Packaging Solutions - Indiana 2020 Production Dr Indianapolis IN 46241 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)									
7											
8											
9											
10											
11											
12											
13											
14											
15											

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