



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: August 29, 2014

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

Source Name: Avery Dennison

Permit Level: Title V – Significant Permit Modification

Permit Number: 059-34594-00018

Source Location: 870 West Anderson Blvd., Greenfield, Indiana

Type of Action Taken: Modification at an existing source

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34594.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Mr. Shawn Short
Avery Dennison
870 West Anderson Blvd.
Greenfield, IN 46140

August 29, 2014

Re: 059-34594-00018
Significant Permit Modification to
Part 70 Renewal No.: T059-29471-00018

Dear Mr. Short:

Avery Dennison was issued a Part 70 Operating Permit Renewal No. T059-29471-00018 on January 24, 2011 for a stationary pressure sensitive paper coating and laminating operation located at 870 West Anderson Blvd., Greenfield, IN 46140. An application requesting changes to this permit was received on May 19, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: 40 CFR 63, Subpart JJJJ, National Emission Standards for Paper and Other Web Coating
- Attachment B: 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations
- Attachment C: 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

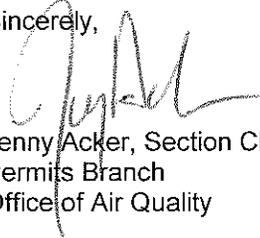
Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.



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 Julie Mendez, of my staff, at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit, Technical Support Document and Appendix A

JA/JM

cc: File - Hancock County
Hancock County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Michael R. Pence
Governor

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Commissioner

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

Avery Dennison
870 West Anderson Blvd.
Greenfield, Indiana 46140

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T059-29471-00018	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch, Office of Air Quality	Issuance Date: January, 24, 2011 Expiration Date: January 24, 2016

First Significant Permit Modification No.: 059-34594-00018	
Issued by:  Jenny Acker, Section Chief, Permits Branch Office of Air Quality	Issuance Date: August 29, 2014 Expiration Date: January 24, 2016

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- Attachment C: NSPS Subpart Dc-- Standards of Performance for Small Industrial-Commercial-
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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Source Address:	870 West Anderson Blvd., Greenfield, Indiana 46140
General Source Phone Number:	(317) 467-6960
SIC Code:	2672
County Location:	Hancock
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 and modified in September 2014, with a maximum capacity of one thousand two hundred forty (1,240) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

- (1) One (1) flow coating operation and one (1) roll coating operation; and
- (2) Two (2) natural gas-fired drying ovens, with a total maximum heat input capacity of 48.7 MMBtu/hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source.
Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

- (b) Two (2) natural gas-fired boilers, identified as B-01 and B-02, constructed in October 1994, with a maximum heat input capacity of 10.205 MMBtu/hr each, exhausting to two (2) stacks (B-01 and B-02).

Under NSPS Subpart Dc, the two (2) natural gas-fired boilers, identified as B-01 and B-02, are considered affected facilities.

- (c) One (1) pressure sensitive paper coating operation, identified as GF-2, constructed in 2000 and modified in 2004, with a maximum capacity of 1,500 billion square inches per year, exhausting to three (3) stacks (E-1, F-1, and G-1), consisting of the following equipment:

- (1) Two (2) flow coating operations, one (1) roll coating operation, and one (1) curtain coating operation;

- (2) Two (2) natural gas-fired drying ovens with a total maximum heat input capacity of 67.86 MMBtu/hr; and
- (3) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 4.0 MMBtu/hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source.
Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

- (d) One (1) natural gas-fired boiler, identified as B-03, constructed in June 2000, with a maximum heat input capacity of 10.205 MMBtu/hr, exhausting to one (1) stack (B-03)

Under 40 CFR 60, Subpart Dc, emission unit B-03 is considered an affected facility.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21), that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T059-29471-00018, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the

permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T059-29471-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that

- meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
-

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 Opacity [326 IAC 5-1]

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

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

C.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 and modified in September 2014, with a maximum capacity of one thousand two hundred forty (1,240), exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
- (1) One (1) flow coating operation and one (1) roll coating operation; and
 - (2) Two (2) natural gas-fired drying ovens, with a total maximum heat input capacity of 48.7 MMBtu/hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

- (b) One (1) pressure sensitive paper coating operation, identified as GF-2, constructed in 2000 and modified in 2004, with a maximum capacity of 1,500 billion square inches per year, exhausting to three (3) stacks (E-1, F-1, and G-1), consisting of the following equipment:
- (1) Two (2) flow coating operations, one (1) roll coating operation, and one (1) curtain coating operation;
 - (2) Two (2) natural gas-fired drying ovens with a total maximum heat input capacity of 67.86 MMBtu/hr; and
 - (3) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 4.0 MMBtu/hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

(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 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

The VOC emissions from the coating units GF-1 and GF-2, including coatings, dilution solvents, and cleaning solvents shall be less than 246.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit together with the potential emissions from other emission units shall limit the total source potential to emit VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of

2.9 pounds VOC per gallon of coating, excluding water, delivered to the coating applicators from the two (2) pressure sensitive paper coating operations, identified as GF-1 and GF-2.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the pressure sensitive paper coating operations, identified as GF-1 and GF-2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (a) Compliance with the VOC content limitation contained in 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.
- (b) Pursuant to 326 IAC 8-1-2, at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with 326 IAC 8-2-5 shall be shown by using the following equation to calculate daily volume weighted average:

$$A = [\sum(c_i) \times U_i / \sum U_i]$$

Where:

A = volume weighted average in pounds VOC per gallon less water as applied;

C_i = VOC content of the coating in pounds VOC per gallon less water as applied; and

U_i = usage rate of the coating in gallons per day.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (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.
- (3) The total VOC usage, including cleanup solvent VOC for each month.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3), shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (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;
 - (B) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (C) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) A log of usage each month and logs of the dates of use when using noncompliant coatings; and
 - (4) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 2.9 pounds per gallon is used.
 - (A) The daily cleanup solvent usage.
 - (B) The total VOC usage for each day.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (a) Two (2) natural gas-fired boilers, identified as B-01 and B-02, constructed in October 1994, with a maximum heat input capacity of 10.205 MMBtu/hr each, exhausting to two (2) stacks (B-01 and B-02). Under NSPS Subpart Dc, emission units B-01 and B-02 are considered affected facilities.
- (b) One (1) natural gas-fired boiler, identified as B-03, constructed in June 2000, with a maximum heat input capacity of 10.205 MMBtu /hr, exhausting to one (1) stack (B-03). Under NSPS Subpart Dc, emission unit B-03 is considered an affected facility.

(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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from each 10.205 MMBtu per hour heat input boiler (B-01 and B-02) shall be limited to 0.498 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 10.205 MMBtu per hour heat input boiler (B-03) shall be limited to 0.448 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

SECTION E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP)

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 and modified in September 2014, with a maximum capacity of one thousand two hundred forty (1,240) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

- (1) One (1) flow coating operation and one (1) roll coating operation; and
- (2) Two (2) natural gas-fired drying ovens, with a total maximum heat input capacity of 48.7 MMBtu /hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

- (b) One (1) pressure sensitive paper coating operation, identified as GF-2, constructed in 2000 and modified in 2004, with a maximum capacity of 1,500 billion square inches per year, exhausting to three (3) stacks (E-1, F-1, and G-1), consisting of the following equipment:

- (4) Two (2) flow coating operations, one (1) roll coating operation, and one (1) curtain coating operation;
- (5) Two (2) natural gas-fired drying ovens with a total maximum heat input capacity of 67.86 MMBtu /hr; and
- (6) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 4.0 MMBtu /hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for pressure sensitive paper coating operations, identified as GF-1 and GF-2, except as otherwise specified in 40 CFR Part 63, Subpart JJJJ.
- (b) Pursuant to 40 CFR 63.9, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 63, Subpart JJJJ]

Pursuant to 40 CFR Part 63, Subpart JJJJ, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating (included as Attachment A to this permit), for the pressure sensitive paper coating operations, identified as GF-1 and GF-2, as follows:

- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300, except for (a) through (f)
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a)
- (5) 40 CFR 63.3320(b)(2)-(3)
- (6) 40 CFR 63.3320(c)
- (7) 40 CFR 63.3330(a)
- (8) 40 CFR 63.3340
- (9) 40 CFR 63.3360(a)(1)
- (10) 40 CFR 63.3360(c)(1)(i)-(iii)
- (11) 40 CFR 63.3360(c)(2)-(4)
- (12) 40 CFR 63.3360(d)(1)-(3)
- (13) 40 CFR 63.3370(a)(1)(i)-(ii)
- (14) 40 CFR 63.3370(a)(2)(i)-(iv)
- (15) 40 CFR 63.3370(a)(3)
- (16) 40 CFR 63.3370(b)(2)
- (17) 40 CFR 63.3370(c)(1)(i)-(ii)
- (18) 40 CFR 63.3370(c)(2)(i)-(ii)
- (19) 40 CFR 63.3370(c)(3)-(4)
- (20) 40 CFR 63.3370(c)(5)(i)-(ii)
- (21) 40 CFR 63.3370(d)
- (22) 40 CFR 63.3370(l)(1)-(5)
- (23) 40 CFR 63.3370(n)(4)
- (24) 40 CFR 63.3370(n)(5)(i)-(iv)
- (25) 40 CFR 63.3370(n)(6)(i)-(iv)
- (26) 40 CFR 63.3400(a)
- (27) 40 CFR 63.3400(b)(1), (3)-(4)
- (28) 40 CFR 63.3400(c)(1)(i)-(v)
- (29) 40 CFR 63.3400(c)(2)(i)-(iv)
- (30) 40 CFR 63.3400(c)(2)(v)(A)-(C)
- (31) 40 CFR 63.3400(c)(2)(vi)(A)-(J)
- (32) 40 CFR 63.3400(e)
- (33) 40 CFR 63.3400(g)(1)-(2)
- (34) 40 CFR 63.3410(a)(1)(iii)-(iv), (vi)
- (35) 40 CFR 63.3410(b)
- (36) 40 CFR 63.3420
- (37) Table 1

SECTION E.2 New Source Performance Standards (NSPS)

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 and modified in September 2014, with a maximum capacity of one thousand two hundred forty (1,240) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
- (1) One (1) flow coating operation and one (1) roll coating operation; and
 - (2) Two (2) natural gas-fired drying ovens, with a total maximum heat input capacity of 48.7 MMBtu.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

- (b) One (1) pressure sensitive paper coating operation, identified as GF-2, constructed in 2000 and modified in 2004, with a maximum capacity of 1,500 billion square inches per year, exhausting to three (3) stacks (E-1, F-1, and G-1), consisting of the following equipment:
- (1) Two (2) flow coating operations, one (1) roll coating operation, and one (1) curtain coating operation;
 - (2) Two (2) natural gas-fired drying ovens with a total maximum heat input capacity of 67.86 MMBtu /hr; and
 - (3) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 4.0 MMBtu /hr.

Under NSPS Subpart RR, the coating line is considered an existing affected source. Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to New Source Performance Standards under 40 CFR Part 60 [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for pressure sensitive paper coating operation, except as otherwise specified in 40 CFR Part 60, Subpart RR.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports 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

E.2.2 Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations
NSPS [40 CFR 60, Subpart RR]

Pursuant to 40 CFR Part 60, Subpart RR, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations (included as Attachment B to this permit), for the pressure sensitive paper coating operations, identified as GF-1 and GF-2, as follows:

- (1) 40 CFR 60.440
- (2) 40 CFR 60.441
- (3) 40 CFR 60.442(a)(1)
- (4) 40 CFR 60.443(a)(1)-(3)
- (5) 40 CFR 60.443(f), (j)
- (6) 40 CFR 60.444(a)
- (7) 40 CFR 60.445(a), (d), (h)
- (8) 40 CFR 60.446(a), (c)
- (9) 40 CFR 60.447(a)-(d)

SECTION E.3 New Source Performance Standards (NSPS)

Facility Description [326 IAC 2-7-5(15)]:

- (a) Two (2) natural gas-fired boilers, identified as B-01 and B-02, constructed in October 1994, with a maximum heat input capacity of 10.205 MMBtu/hr each, exhausting to two (2) stacks (B-01 and B-02). Under NSPS Subpart Dc, emission units B-01 and B-02 are considered affected facilities.
- (b) One (1) natural gas-fired boiler, identified as B-03, constructed in June 2000, with a maximum heat input capacity of 10.205 MMBtu/hr, exhausting to one (1) stack (B-03). Under NSPS Subpart Dc, emission unit B-03 is considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.3.1 General Provisions Relating to New Source Performance Standards under 40 CFR Part 60 [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for boilers B-01, B-02, and B-03, except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports 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

E.3.2 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generation Units NSPS [40 CFR 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc, Standard of Performance for Small Industrial-Commercial-Institutional Steam Generation Units (included as Attachment C to this permit), for the boilers B-01, B-02, and B-03 as follows:

- (1) 40 CFR 60.40c
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(g), (i), (j)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-29471-00018

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-29471-00018

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-29471-00018
Facility: GF-1 and GF-2
Parameter: VOC input
Limit: Less than 246.1 tons VOC per twelve (12) consecutive month period

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison
 Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
 Part 70 Permit No.: T059-29471-00018

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70 Significant Source
Modification**

Source Description and Location

Source Name:	Avery Dennison
Source Location:	870 West Anderson Blvd., Greenfield, IN 46140
County:	Hancock
SIC Code:	2672
Operation Permit No.:	T 059-29471-00018
Operation Permit Issuance Date:	January 24, 2011
Significant Source Modification No.:	059-34547-00018
Significant Permit Modification No.:	059-34594-00018
Permit Reviewer:	Julie Mendez

Existing Approvals

The source was issued Part 70 Operating Permit No. T059-29471-00018 on January 24, 2011. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Hancock County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (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. Hancock 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) **PM_{2.5}**
Hancock County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
Hancock 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.

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	1.4
PM ₁₀	5.4
PM _{2.5}	5.4
SO ₂	0.3
NO _x	73.1
VOC	<250
CO	61.4
GHGs as CO ₂ e	N/A
Single HAP	>10
Total HAPs	>25

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) These emissions are based upon the Technical Support Document for Part 70 Operating Permit Renewal No. T059-29471-00018.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Avery Dennison on May 19, 2014, relating to the increase in maximum capacity of a paper coating line (GF-1). The following is a list of the proposed emission unit and pollution control devices:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 and modified in September 2014, with a maximum capacity of one

thousand two hundred forty (1,240) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

- (1) One (1) flow coating operation and one (1) roll coating operation; and

Under NSPS Subpart RR, the coating line is considered an existing affected source.
 Under NESHAP Subpart JJJJ, the coating line is considered an existing affected source.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source
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Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Increase from Modification (ton/yr)
PM	1.4	1.4	0
PM ₁₀	5.4	5.4	0
PM _{2.5}	5.4	5.4	0
SO ₂	0.3	0.3	0
VOC	480.9	528.2	47.3
CO	61.4	61.4	0
NO _x	73.1	73.1	0
HAPs	354.4	389.5	35.1

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit VOC is greater than twenty-five (25) tons per year and subject to 326 IAC 2-7-10.5(g)(6) because the potential to emit any combination of HAPs is greater than twenty-five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because the modification requires a case-by-case determination of an emission limitation.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the entire source. Any control equipment is considered federally enforceable only after issuance of this Part 70 source permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	GHGs
Coating Operation GF-1	-	-	-	-	<246.1	-	-	-
Coating Operation GF-2	-	-	-	-		-	-	-
Drying Ovens GF-1	0.4	1.6	1.6	0.1	1.2	17.9	21.3	-
Drying Ovens GF-2	0.6	2.4	2.4	0.2	1.7	26.4	31.5	-
Boiler B-01	0.1	0.3	0.3	0.0	0.2	3.8	4.5	-
Boiler B-02	0.1	0.3	0.3	0.0	0.2	3.8	4.5	-
Boiler B-03	0.1	0.3	0.3	0.0	0.2	3.8	4.5	-
Insignificant natural gas-fired units	0.1	0.5	0.5	0.0	0.4	5.7	6.8	-
Total for Entire Source	1.4	5.4	5.4	0.3	<250	61.4	73.1	-
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000

*PM_{2.5} listed is direct PM_{2.5}.

"-" = the process/emission unit has no emissions of the designated pollutant

This modification to an existing minor PSD stationary source is not major because

- (a) The emissions of each PSD regulated pollutant from the entire source, excluding GHGs, are less than the PSD major source thresholds; and
- (b) The emissions increase of GHGs from this modification to an existing minor PSD source are less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

This source has elected to limit the potential to emit of entire source below PSD major source threshold as follows:

- (a) The source-wide use of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than 246.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit together with potential emissions of other emissions units will limit the VOC emissions from the entire source to less than 250 tons per year and renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

COMPLIANCE ASSURANCE MONITORING:

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Coating Operation GF-1 (VOC)	none	Y	237.7	-	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the modified units as part of this modification permit. There is no control device for the coating line VOC emissions; therefore, the requirements of CAM are not applicable to the coating lines for VOC. There are no control devices for any other existing units; therefore, the requirements of CAM are not applicable to any other existing units.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Nonattainment New Source Review)

Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

(a) The pressure sensitive paper coating operation, identified as GF-1, was installed before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The potential to emit annual emissions is less than the following emission thresholds:

- (a) Two thousand five hundred (2,500) tons per year of any of the following:
 - (1) Carbon monoxide.
 - (2) Oxides of nitrogen.
 - (3) Sulfur dioxide.
- (b) Two hundred fifty (250) tons per year of either of the following:
 - (1) Particulate matter less than or equal to ten (10) micrometers (PM₁₀).
 - (2) Volatile organic compounds.

In accordance with the compliance schedule in 326 IAC 2-6-3(b)(2), an emission statement must be submitted triennially. The first report is due no later than July 1, 2014, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no additional compliance determination and compliance monitoring requirements applicable to this source.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 059-29471-00018. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(**14**) (~~15~~)] [326 IAC 2-7-1(22)]

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14) ~~(15)~~]

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

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 **and modified in September 2014**, with a maximum capacity of ~~nine hundred ninety-three (993)~~ **one thousand two hundred forty (1,240)** billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14) ~~(15)~~]

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(3534), and
- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (c) A "responsible official" is defined at 326 IAC 2-7-1(3534).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13) (12)] [326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

B.11 Emergency Provisions [326 IAC 2-7-16]

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3534~~).

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(~~9~~) **(8)** be revised in response to an emergency.

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3534~~).

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), ~~or (c), or (e)~~ without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), ~~or (c), or (e)~~. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), ~~and (c)(1), and (e)(2)~~.

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

C.7 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition. IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) **For new units:**

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

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

IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

C.12 Risk Management Plan [326 IAC 2-7-5(1142)] [40 CFR 68]

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534).

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following, where applicable:**

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3534). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 **and modified in September 2014**, with a maximum capacity of ~~nine hundred ninety-three (993)~~ **one thousand two hundred forty (1,240)** billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

~~Pursuant to T059-12392-00018, issued on October 27, 2000, and revised in this Part 70 operating permit renewal, The source-wide use of VOC emissions from the coating units GF-1 and GF-2, including coatings, dilution solvents, and cleaning solvents shall be less than 246.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~This usage limit is required to~~ **Compliance with the above limit together with the potential emissions from other emission units shall** limit the total source potential to emit VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period. ~~Compliance with this limit makes and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.~~

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(1243)]

IDEM OAQ has decided to update the equation to be consistent with 326 IAC 8-1-2(a)(7) language. This equation is more condensed than the prior equation.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (b) Pursuant to 326 IAC 8-1-2, at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with 326 IAC 8-2-5 shall be shown by using the following equation to calculate daily volume weighted average:

$$\frac{\text{lbVOC}}{\text{Gallon, Less Water}} = \frac{\sum \text{coatings} [D_c * O * Q / (1 - W * D_c / D_w)]}{\sum C}$$

Where:

~~D_c = density of coating (lb/gal) D_w = density of water (lb/gal)
O = weight percent organics (%) Q = quantity of coating (gal/unit)
W = percent volume water (%) C = total of coatings used (gal/unit)~~

$$A = [\Sigma(c_i) \times U_i / \Sigma U_i]$$

Where:

A = volume weighted average in pounds VOC per gallon less water as applied;

**C_i = VOC content of the coating in pounds VOC per gallon less water as applied;
and**

U_i = usage rate of the coating in gallons per day.

D.1.6 Record Keeping Requirements

(4) ~~The weight of VOC emitted for each compliance period.~~

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3534~~).

IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~1415~~)]

SECTION E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP)

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 **and modified in September 2014**, with a maximum capacity of ~~nine hundred ninety three (993)~~ **one thousand two hundred forty (1,240)** billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

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

SECTION E.2

New Source Performance Standards (NSPS)

Emissions Unit Description:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, constructed in October 1994 **and modified in September 2014**, with a maximum capacity of ~~nine hundred ninety three (993)~~ **one thousand two hundred forty (1,240)** billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

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

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

The Quarterly Deviation and Compliance Monitoring Report

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 059-34547-00018 and Significant Permit Modification No. 059-34594-00018. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Julie Mendez at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Potential to Emit Summary**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

Uncontrolled Potential to Emit (ton/yr)											
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs	HAPs	Worst Single HAP	
Coating Operation GF-1	-	-	-	-	-	237.7	-	-	176.1	176.1	Vinyl Acetate
Coating Operation GF-2	-	-	-	-	-	286.6	-	-	212.3	212.3	Vinyl Acetate
Drying Ovens GF-1	0.40	1.6	1.6	0.1	21.3	1.2	17.9	-	0.40	0.38	Hexane
Drying Ovens GF-2	0.60	2.4	2.4	0.2	31.5	1.7	26.4	-	0.59	0.56	Hexane
Boiler B-01	0.10	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Boiler B-02	0.10	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Boiler B-03	0.10	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Insignificant natural gas-fired units	0.10	0.5	0.5	0.0	6.8	0.4	5.7	-	0.13	0.12	Hexane
Total	1.4	5.4	5.4	0.3	73.1	528.2	61.4	-	389.5	388.4	Vinyl Acetate

Limited Potential to Emit After Issuance (ton/yr)											
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs	HAPs	Worst Single HAP	
Coating Operation GF-1	-	-	-	-	-	246	-	-	186.6 ⁽¹⁾	182.3	Vinyl Acetate
Coating Operation GF-2	-	-	-	-	-		-	-			
Drying Ovens GF-1	0.4	1.6	1.6	0.1	21.3	1.2	17.9	-	0.40	0.38	Hexane
Drying Ovens GF-2	0.6	2.4	2.4	0.2	31.5	1.7	26.4	-	0.59	0.56	Hexane
Boiler B-01	0.1	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Boiler B-02	0.1	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Boiler B-03	0.1	0.3	0.3	0.0	4.5	0.2	3.8	-	negl	negl	-
Insignificant natural gas-fired units	0.1	0.5	0.5	0.0	6.8	0.4	5.7	-	0.13	0.12	Hexane
Total	1.4	5.4	5.4	0.3	73.1	249.9	61.4	-	187.7	182.3	Vinyl Acetate

Previous calculations did not include VOC from the boilers, drying ovens, or insignificant natural gas-fired units. The increase from modification reflects a correction to the calculation.

Previous calculations considered HAPs from both coatings, not the worst-case coating. The increase from modification reflects a correction to the calculation.

negl. = negligible

"-" = the process/emission unit has no emissions of the designated pollutant

(1) Limiting potential VOC emissions on GF-1 and GF-2 to less than 246.1 tons per year will proportionately limit potential HAP emissions.

**Appendix A: Emissions Calculations
Potential VOC Emissions From Coating Operations EU GF-1**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

THROUGHPUT	
EU GF-1	MMin ² /YEAR
Coating 1	1240000
Coating 2	1240000
Silicone Coater 3	1240000

INK VOCS					
EU GF-1	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Coating 1	71	0.50000%	100.00%	1240000	220.1
Coating 2	25.5	0.00034%	100.00%	1240000	0.05
Silicone Coater 3	2.84	1.00000%	100.00%	1240000	17.6

Total VOC Emissions =	237.7 Ton/yr
------------------------------	---------------------

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

Appendix A: Emissions Calculations
Change in Potential VOC Emissions From Coating Operations EU GF-1

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

CHANGE IN THROUGHPUT	
EU GF-1	MMin ² /YEAR
Coating 1	247000
Coating 2	247000
Silicone Coater 3	247000

INK VOCS					
EU GF-1	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Coating 1	71	0.50000%	100.00%	247000	43.8
Coating 2	25.5	0.00034%	100.00%	247000	0.0
Silicone Coater 3	2.84	1.00000%	100.00%	247000	3.5

Total VOC Emissions =	47.3 Ton/yr
------------------------------	--------------------

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

**Appendix A: Emissions Calculations
Potential VOC Emissions From Coating Operations EU GF-2**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

THROUGHPUT			
Press ID**	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Waterbased Coating 1	3000	79	1494806
Waterbased Coating 2	3000	79	1494806
Silicone Coater 3	3000	79	1494806

INK VOCS					
Ink Name Press ID	Maximum Coverage '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Waterbased Coating 1	71	0.50000%	100.00%	1494806	265.3
Waterbased Coating 2	25.5	0.00034%	100.00%	1494806	0.06
Silicone Coater 3	2.84	1.00000%	100.00%	1494806	21.2

Total VOC Emissions =	286.6 Ton/yr
-----------------------	---------------------

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

**Appendix A: Emissions Calculations
Potential HAP Emissions From Coating Operation EU GF-1**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

THROUGHPUT	
Press ID**	MMin ² /YEAR
Coating 1	1240000
Coating 2	1240000
Silicone Coater 3	1240000

INK HAP					
Press ID: HAP	Maximum Coverage '(lbs/MMin ²)	Weight % HAP*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Coating 1: Vinyl Acetate	71	0.40000%	100.00%	1240000	176.1
Coating 2: Formaldehyde	25.5	0.01630%	100.00%	1240000	2.58
Coating 2: Methanol	25.5	0.01040%	100.00%	1240000	1.64
Silicone Coater 3	2.84	0.00000%	100.00%	1240000	0.00

Total HAP Emissions =	176.1 Ton/yr
-----------------------	---------------------

*HAP (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % HAP * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

HAP = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

Appendix A: Emissions Calculations
Change in Potential HAP Emissions From Coating Operation EU GF-1

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

CHANGE IN THROUGHPUT	
Press ID**	MMin ² /YEAR
Coating 1	247000
Coating 2	247000
Silicone Coater 3	247000

INK HAP					
Press ID: HAP	Maximum Coverage '(lbs/MMin ²)	Weight % HAP*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Coating 1: Vinyl Acetate	71	0.40000%	100.00%	247000	35.1
Coating 2: Formaldehyde	25.5	0.01630%	100.00%	247000	0.51
Coating 2: Methanol	25.5	0.01040%	100.00%	247000	0.33
Silicone Coater 3	2.84	0.00000%	100.00%	247000	0.00

Total HAP Emissions =	35.1 Ton/yr
-----------------------	--------------------

*HAP (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % HAP * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

HAP = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

Appendix A: Emissions Calculations
Potential HAP Emissions From Coating Operation EU GF-2

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

THROUGHPUT			
Press ID**	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Coating 1	3000	79	1494806
Coating 2	3000	79	1494806
Silicone Coater 3	3000	79	1494806

INK HAP					
Press ID: HAP	Maximum Coverage '(lbs/MMin ²)	Weight % HAP*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Coating 1: Vinyl Acetate	71	0.40000%	100.00%	1494806	212.3
Coating 2: Formaldehyde	25.5	0.01630%	100.00%	1494806	3.11
Coating 2: Methanol	25.5	0.01040%	100.00%	1494806	1.98
Silicone Coater 3	2.84	0.00000%	100.00%	1494806	0.00

Total HAP Emissions =	212.3 Ton/yr
------------------------------	---------------------

*HAP (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % HAP * Flash off * Throughput * 1 Ton per 2000 pounds

** Use worst-case between Coating 1 and Coating 2, plus the addition of Silicone Coater 3.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-01**

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.2

89.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	4.5	0.2	3.76

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 9 for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-01
HAP Emissions

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.391E-05	5.366E-05	3.354E-03	8.050E-02	1.520E-04

HAP - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.236E-05	4.919E-05	6.261E-05	1.699E-05	9.391E-05

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-02**

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.2

89.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	4.5	0.2	3.75

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 11 for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-02
HAP Emissions

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.4E-05	5.4E-05	3.4E-03	8.0E-02	1.5E-04

HAP - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.2E-05	4.9E-05	6.3E-05	1.7E-05	9.4E-05

Methodology is the same as page 10.

The five highest organic and metal HAP emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-03**

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.2

89.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	4.5	0.2	3.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 13 for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler B-03
HAP Emissions

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.4E-05	5.4E-05	3.4E-03	8.0E-02	1.5E-04

HAP - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.2E-05	4.9E-05	6.3E-05	1.7E-05	9.4E-05

Methodology is the same as page 12.

The five highest organic and metal HAPs emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
GF-1 Natural Gas Ovens**

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

48.7

426.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.6	0.1	21.3	1.2	17.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 15 for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
GF-1 Natural Gas Ovens
HAP Emissions

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.5E-04	2.6E-04	1.6E-02	3.8E-01	7.3E-04

HAP - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.1E-04	2.3E-04	3.0E-04	8.1E-05	4.5E-04

Methodology is the same as page 14.

The five highest organic and metal HAP emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
GF-2 Natural Gas Ovens**

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

71.9

629.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.6	2.4	0.2	31.5	1.7	26.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 17 for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAP Emissions
GF-2 Natural Gas Ovens

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.6E-04	3.8E-04	2.4E-02	5.7E-01	1.1E-03

HAP - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.6E-04	3.5E-04	4.4E-04	1.2E-04	6.6E-04

Methodology is the same as page 16.

The five highest organic and metal HAP emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

15.5

135.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.5	0.0	6.8	0.4	5.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 19 for HAP emissions calculations.

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd, Greenfield, Indiana 46140
Operating Permit Number: T 059-29471-00018
Significant Source Mod. No: 059-34547-00018
Significant Permit Mod. No: 059-34594-00018
Reviewer: Julie Mendez

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.4E-04	8.1E-05	5.1E-03	1.2E-01	2.3E-04

HAP - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.4E-05	7.5E-05	9.5E-05	2.6E-05	1.4E-04

Methodology is the same as page 18.

The five highest organic and metal HAP emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Shawn Short
Avery Dennison
870 West Anderson Blvd.
Greenfield, Indiana 46140

DATE: August 29, 2014

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

SUBJECT: Final Decision
Title V – Significant Permit Modification
059-34594-00018

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:
Holly Argiris / ERM
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 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 29, 2014

TO: Hancock County Public Library

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

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

Applicant Name: Avery Dennison
Permit Number: 059-34594-00018

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 6/13/2013

Mail Code 61-53

IDEM Staff	AWELLS 8/29/2014 Avery Dennison 059-34594-00018 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Shawn Short Avery Dennison 870 W Anderson Blvd Greenfield IN 46140 (Source CAATS) confirmed delivery										
2		Jim Richardson VP Supply Chain and Ops MGNA Avery Dennison 8080 Norton Parkway Bldg 22 Mentor OH 44060 (RO CAATS)										
3		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)										
4		Hancock County Public Library 900 West McKenzie Greenfield IN 46140-1741 (Library)										
5		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)										
6		Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)										
7		Holly Argiris Environmental Resources Management (ERM) 11350 N. Meridian, Ste 320 Carmel IN 46032 (Consultant)										
8		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)										
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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
7			