



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: December 31, 2014

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

Source Name: Multi-Color Corporation

Permit Level: Title V- Renewal

Permit Number: 143-34633-00007

Source Location: 2281 South US 31 Scottsburg, Indiana

Type of Action Taken: Modification at an existing source
Revisions to permit requirements

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 34633.

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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
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Mr. Aron Kratky
Multi-Color Corporation
2281 South U.S. 31
Scottsburg, IN, 47170

December 31, 2014

Re: 143-34633-00007
Significant Permit Modification to
Part 70 Renewal No.: T143-30351-00007

Dear Mr. Kratky:

Multi-Color Corporation was issued a Part 70 Operating Permit Renewal No. T143-30351-00007 on October 12, 2011 for a stationary packaging rotogravure printing operation located at 2281 South U.S. 31, Scottsburg, IN 47170. An application requesting changes to this permit was received on June 13, 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: NESHAP, Subpart KK
Attachment B: NSPS, Subpart Dc

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 Tamera Wessel, of my staff, at 317-234-8530 or 1-800-451-6027, and ask for extension 4-8530.

Sincerely,



Jason Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit and Technical Support Document

SC/tw

cc: File - Scott County
Scott County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section
IDEM Southeast Regional Office



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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Multi-Color Corporation
2281 South U.S. 31
Scottsburg, Indiana 47170

(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.

Table with 2 columns: Issued by (Chrystal Wagner, Section Chief, Permits Branch, Office of Air Quality) and Issuance/Expiration Dates (Issuance: October 12, 2011; Expiration: October 12, 2016). Includes Operation Permit No.: 143-30351-00007.

Table with 2 columns: Issued by (Jason Krawczyk, Section Chief, Permits Branch, Office of Air Quality, with signature) and Issuance/Expiration Dates (Issuance: December 31, 2014; Expiration: October 12, 2016). Includes Significant Permit Modification No.: 143-32977-00007 and 143-34633-00007.

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Quarterly Report

Quarterly Report

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Attachment A - NESHAP, Subpart KK

Attachment B - NSPS, Subpart Dc

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 packaging rotogravure printing operation.

Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
General Source Phone Number:	(812) 752-8205
SIC Code:	2754
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset 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) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as

S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source; and

- (d) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, to be constructed in 2013, exhausting through one (1) stack identified as S-OXD7. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.
- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, approved for construction in 2010, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, with a projected solvent consumption rate of forty eight (48) gallons per day and modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

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 also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21), which are specifically regulated:

- (a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, constructed in 2013, rated at 10 MMBtu per hour and exhausting through one (1) stack identified as S005. [40 CFR Part 60, Subpart Dc][326 IAC 6-2-4].

- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.[326 IAC 8-3-2][326 IAC 8-3-8]

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, T143-30351-00007, 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, or Southeast Regional Office 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
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 T143-30351-00007 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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (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) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 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.12 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.13 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.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]

- (I) 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.
- (II)
 - (a) CAM Response to excursions or exceedances.
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of

the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
 - (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
 - (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
 - (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
 - (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing,

reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 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.16 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)(3), starting in 2006 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.17 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.18 General Reporting Requirements [40 CFR 64][326 IAC 3-8][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.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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.19 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

FACILITY OPERATION CONDITIONS

Presses 1, 2, 4 and 5 Using Compliant Coating Material for 326 IAC 8 Compliance Purpose

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source; and
- (d) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, to be constructed in 2013, exhausting through one (1) stack identified as S-OXD7. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press#5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(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.1.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5(f), work practices for Presses #1, #2, #4 and #5 shall include, but not be limited to, the following:

- (a) When not in use, all cleaning materials shall be kept in closed containers.
- (b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.1.3 PSD Minor Limit [326 IAC 2-2]

The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #2, #4 and #5 (emission units P1U1 through P1U10, P2U1 through P2U9, P4U1 through P4U10 and P5U1 through P5U10) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%.

Compliance with the above limit in conjunction with Condition D.3.3 and VOC emissions from natural gas combustion, and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year. Therefore, this is a minor source under 326 IAC 2-2.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) Control

In order to comply with Condition D.1.2, the catalytic oxidizer OXD#5 and thermal oxidizers OXD#6 and OXD#7 shall be in operation and control emissions from the associated presses at all times the associated presses are in operation.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 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.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance with Condition D.1.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#5 and OXD#6 no later than 2.5 years from the most recent testing performed on these oxidizers. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) Within one eighty (180) days of startup of Press #5, in order to demonstrate the compliance with Condition D.1.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.1.8 Thermal Oxidizer Temperature

- (a) The Permittee shall determine the 3-hour average combustion zone temperature from the most recent valid stack test that demonstrates compliance with the minimum overall VOC control efficiency requirement in condition D.1.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#6 and OXD#7 for measuring combustion zone temperature. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the temperature determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.9 Catalytic Incinerator Temperature

- (a) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the most recent valid stack test that demonstrates compliance with minimum overall VOC control efficiency requirement in condition D.1.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#5 for measuring catalyst bed inlet and outlet temperatures. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average catalyst bed inlet and outlet temperatures of the thermal oxidizer are below the temperatures determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.10 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Record keeping Requirements [326 IAC 8-1-10]

- (a) To document the compliance status with Condition D.1.1, pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used.
 - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.
 - (3) A log of the dates of use.
 - (4) The total VOC usage for each month at each press.
 - (5) The weight of VOCs emitted for each compliance period for each press.

- (6) The following operation parameters of catalytic incinerators and thermal oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency of the control devices;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and
 - (D) Continuous temperature readings.
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.13 Reporting Requirements [326 IAC 8-1-10]

- (a) In order to demonstrate compliance with Condition D.1.1, pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
 - (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

- (4) The name and identification number of each coating, as applied, used at each coating facility; and
- (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.1.14 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.2

FACILITY OPERATION CONDITIONS

Presses 1, 2, 4 and 5 Using Oxidizers for 326 IAC 8 Compliance Purpose

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source;
- (d) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, to be constructed in 2013, with a maximum design capacity of 14.5 MMBtu/hr, to be constructed in 2013, exhausting through one (1) stack identified as S-OXD7. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(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 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and

operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
 - (1) Reserved.
 - (2) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The natural gas fired regenerative thermal oxidizer identified as OXD#6 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (4) The natural gas fired regenerative thermal oxidizer identified as OXD#7 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), the presses #1, #2 #4 and #5 are subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
 - (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.
 - (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.2.2 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5(f), work practices for Presses #1, #2, #4 and #5 shall include, but not be limited to, the following:

- (a) When not in use, all cleaning materials shall be kept in closed containers.
- (b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.2.3 PSD Minor Limit [326 IAC 2-2]

The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #2, #4 and #5 (emission units P1U1 through P1U10, P2U1 through P2U9, P4U1 through P4U10 and P5U1 through P5U10) shall be limited to 3,292 tons per twelve (12) consecutive month

period with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%.

Compliance with the above limit in conjunction with Condition D.3.3 and VOC emissions from natural gas combustion, and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year. Therefore, this is a minor source under 326 IAC 2-2.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) Control

In order to comply with Conditions D.2.1 and D.2.3, the catalytic oxidizer OXD#5 and thermal oxidizers OXD#6 and OXD#7 shall be in operation and control emissions from the associated presses at all times the associated presses are in operation.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.3 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.2.7 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;

- (3) Type of VOC containing process material being used; and
- (4) The process and control system parameters that will be monitored during the test.

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance with Condition D.2.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#5 and OXD#6 no later than 2.5 years from the most recent testing performed on these oxidizers. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.
- (b) Within 180 days after the startup of Press #5, in order to demonstrate the compliance with Condition D.2.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Thermal Oxidizer Temperature

- (a) The Permittee shall determine the 3-hour average combustion zone temperature from the most recent valid stack test that demonstrates compliance with Conditions D.2.1 and D.2.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#6 and OXD#7 for measuring combustion zone temperature. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the temperature determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.10 Catalytic Incinerator Temperature

- (a) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the most recent valid stack test that demonstrates compliance with Conditions D.2.1 and D.2.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#5 for measuring catalyst bed inlet and outlet temperatures. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average catalyst bed inlet and outlet temperatures of the thermal oxidizer are below the temperatures determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or

Exceedances shall be considered a deviation from this permit.

D.2.11 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and
- (b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

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

D.2.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.2.13 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
 - (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.2.9 pursuant to 326 IAC 8-1-12(b)(1)(C).

- (6) Control device monitoring data as follows:
 - (A) For the thermal incinerator, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For each catalytic incinerator, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.2.14 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used.

- (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.
 - (3) A log of the dates of use;
 - (4) The total VOC usage for each month at each press;
 - (5) The weight of VOCs emitted for each compliance period for each press; and
 - (6) The following operation parameters of catalytic incinerators and thermal oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency of the control devices;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and
 - (D) Continuous temperature readings.
- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.2.15 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and
 - (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.2.16 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, approved for construction in 2010, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, with a projected solvent consumption rate of forty eight (48) gallons per day and modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

Insignificant Activities:

- (b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaning degreasers without remote solvent reservoirs constructed after July 1, 1990:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.

- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Reserved

D.3.3 PSD Minor Limit [326 IAC 2-2]

The total VOC usage at PW2 through PW5 shall be limited to 174 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%.

Compliance with the above limit in conjunction with Condition D.2.3/D.3.3 and VOC emissions from natural gas combustion, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year. Therefore, this is a minor source under 326 IAC 2-2.

D.3.4 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the solvent manufacturer.

D.3.7 Volatile Organic Compounds (VOC) Control

- (a) In order to comply with Condition D.3.3, the catalytic oxidizer OXD#2 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#2.
- (b) In order to comply with Condition D.3.3, the thermal oxidizer OXD#7 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#7.

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within 180 days after the issuance of this permit SSM 143-32975-00007, in order to demonstrate the compliance with Condition D.3.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#2. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) In order to demonstrate compliance with Condition D.3.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.9 Catalytic Incinerator Temperature

- (a) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the most recent valid stack test that demonstrates compliance with Condition D.3.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#2 for measuring catalyst bed inlet and outlet temperatures. The output of the temperature

monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average catalyst bed inlet and outlet temperatures of the thermal oxidizer are below the temperatures determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.10 Thermal Oxidizer Temperature

- (a) The Permittee shall determine the 3-hour average combustion zone temperature from the most recent valid stack test that demonstrates compliance with the minimum overall VOC control efficiency requirement in condition D.1.3, as approved by IDEM.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#7 for measuring combustion zone temperature. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the temperature determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.3.3.
 - (1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage in parts washer PW2 and PW3 for each month.
 - (5) The weight of VOC emitted for each compliance period.
 - (6) The following operation parameters of the catalytic oxidizer incinerator and thermal oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency of the control devices;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and

(D) Continuous temperature readings.

- (b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.3.12 Record Keeping Requirements

To document compliance with Conditions D.3.4, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.
- (c) The type of solvent purchased.
- (d) The total volume of the solvent purchased.
- (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.13 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.3.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, constructed in 2013, rated at 10 MMBtu per hour and exhausting through one (1) stack identified as S005 [40 CFR Part 60, Subpart Dc][326 IAC 6-2-4].

(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.4.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.4.2 RESERVED

Compliance Determination Requirements

D.4.3 RESERVED

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

D.4.4 RESERVED

SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.
- (b) One (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P2U1-P2U9 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #2 (nine stations: P2U1 through P2U9) are considered an existing affected source.
- (c) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, then exhausted through one (1) stack identified as S-OXD5. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press # 4, (ten stations: P4U1 through P4U10) are considered an existing affected source.
- (d) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, to be constructed in 2013, with a maximum design capacity of 14.5 MMBtu/hr, to be constructed in 2013, exhausting through one (1) stack identified as S-OXD7. Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(The information describing the process contained in this facility 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 NESHAP Subpart KK [326 IAC 20-1] [40 CFR Part 63, Subpart A]
Pursuant to 40 CFR 63.823, 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, as specified in Table 1 of 40 CFR Part 63, Subpart KK in accordance with schedule in 40 CFR 63

Subpart KK.

E.1.2 Printing and Publishing Industry) NESHAP [40 CFR 63, Subpart KK] [326 IAC 20-18]

Pursuant to CFR Part 63, Subpart KK, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart KK (included as Attachment A), which are incorporated by reference as 326 IAC 20-18-1, as specified below.

- (a) 40 CFR 63.820 (a)
- (b) 40 CFR 63.821
- (c) 40 CFR 63.822
- (d) 40 CFR 63.823
- (e) 40 CFR 63.825
- (f) 40 CFR 63.826 (a) and (c)
- (g) 40 CFR 63.827
- (h) 40 CFR 63.828
- (i) 40 CFR 63.829, except 40 CFR 63.829 (f)
- (j) 40 CFR 63.830
- (k) 40 CFR 63.831

E.1.3 One Time Deadlines Relating to NESHAP, Subpart KK

The Permittee shall conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by May 30, 1999. The initial performance test was conducted on January 15, 1999.

SECTION E.2

FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, constructed in 2013, rated at 10 MMBtu per hour and exhausting through one (1) stack identified as S004 [40 CFR Part 60, Subpart Dc][326 IAC 6-2-4].

(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 [40 CFR 60]

- E.2.1 General Provision Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart 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 the Boiler, identified as TH2 except as otherwise specified in 40 CFR Part 60, Subpart Dc.

- E.2.2 Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units [326 IAC 12-1] [40 CFR 60, Subpart Dc]

Pursuant to 40 CFR 60 Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units for the Boiler, identified as TH2 as specified as follows:

1. 40 CFR 60.40c(a),(b),(c) and (d)
2. 40 CFR 60.41c
3. 40 CFR 60.48c(a),(a)(1), (1)(3), (g) and (i).

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

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007

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: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007

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: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007
Facility: Presses #1, #2, #4 and #5 emission units P1U1-10, P2U1-9, P4U1-10 and P5U1-10
Parameter: Volatile organic compounds (VOC) usage
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #2, #4 and #5 (emission units P1U1 through P1U10, P2U1 through P2U9, P4U1 through P4U10 and P5U1 through P5U10) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007
Facility: Parts Washers PW2 through PW5
Parameter: Volatile organic compounds (VOC) usage
Limit: The total VOC usage at PW2 through PW5 shall be limited to 174 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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 Permit Modification**

Source Description and Location

Source Name:	Multi-Color Corporation
Source Location:	2281 South U.S. 31, Scottsburg, IN 47170
County:	Scott
SIC Code:	2754 (Commercial Printing, Gravure)
Operation Permit No.:	T143-30351-00007
Operation Permit Issuance Date:	October 12, 2011
Significant Permit Modification No.:	143-34633-00007
Permit Reviewer:	Tamera Wessel

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T143-30351-00007 on October 12, 2011. The source has since received the following approvals:

- (a) Significant Permit Modification No. 143-32977-00007 issued on July 15, 2013; and
- (b) Significant Source Modification No. 143-32975-00007, issued on June 28, 2013.

County Attainment Status

The source is located in Scott 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. Scott 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}**
Scott 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
Scott County has been classified as attainment or unclassifiable in Indiana for all other criteria regulated 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	0.53
PM ₁₀	2.12
PM _{2.5}	2.12
SO ₂	0.17
NO _x	27.95
VOC	213.76
CO	23.48
HAPs	
Single HAP	>10
Total HAPs	>25

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (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) 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).

- (c) These emissions are based upon the TSD for Part 70 Significant Source Modification No.143-32975-00007 issued June 28, 2013 and Significant Permit Modification No. 143-32977-00007 issued July 15, 2013.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Multi-Color Corporation on June 13, 2014, relating to the expansion of the permanent total enclosure to incorporate the ink storage room and to the modification of the ducting of the parts washer rooms (PW2-PW5) to have the option of exhausting to catalytic oxidizer #2 (OXD #2) or #7 (OXD #7). The following is a list of the modified emission units and pollution control devices:

- (a) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (b) One (1) mechanical spray cold cleaner degreaser, identified as PW3, approved for construction in 2010, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (c) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.
- (d) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, with a projected solvent consumption rate of forty eight (48) gallons per day and modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

This modification will not alter the unlimited potential to emit or the maximum throughput of the degreaser processes.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Permit Level Determination – Part 70 Modification to an Existing Source

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.”

There is no increase in the unlimited potential to emit of any regulated pollutants associated with this modification. This modification is not subject to the source modification requirements under 326 IAC 2-7-10.5. The changes will be incorporated into the permit as a Significant Permit Modification under 326 IAC 2-7-12(d)(1), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions.

Permit Level Determination – PSD or Emission Offset

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

There are no increases in the unlimited potential to emit of any regulated pollutants associated with this modification.

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.

CAM:

- (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)
Degreasing PW2	Catalytic Oxidizer or RTO	Y	75.47	4.38	100	N	N
Degreasing PW3	Catalytic Oxidizer or RTO	Y	14.93	0.87	100	N	N
Degreasing PW4	Catalytic Oxidizer or RTO	Y	14.93	0.87	100	N	N
Manual Degreaser PW5	Catalytic Oxidizer or RTO	Y	61.02	3.54	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the degreasing units as part of this modification.

State Rule Applicability Determination

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

Pursuant to 326 IAC 8-3-8, on and after January 1, 2015, material requirements for the cold cleaner degreasers identified as, PW2, PW3, PW4 and PW5, are as follows:

- (1) No person shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (2) All persons subject to the requirements of subsection (b)(2) shall maintain each of the following records for each purchase:
 - (A) The name and address of the solvent supplier.
 - (B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (C) The type of solvent purchased.
 - (D) The total volume of the solvent purchased.
 - (E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (3) All required records shall be:
 - (A) Retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (B) Reasonably accessible for an additional two (2) year period.

There are no other new applicable requirements as a result of this modification.

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.

The Compliance Determination Requirements applicable to this modification are as follows:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Degreasers (PW2, PW3, PW4 and PW5)	OXD#7	2.5 years from the date of the most recent valid compliance demonstration	VOC	every 2.5 years	overall VOC control efficiency (as the product of destruction efficiency and capture efficiency) shall be at least 94.20%

The compliance monitoring requirements applicable to this modification are as follows:

Emission Unit	Control Device	Parameter	Frequency
Degreasers (PW2, PW3, PW4 and PW5)	OXD#7	Combustion Temperature	Continuous

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T143-30351-00007. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Change 1: The descriptions of PW2, PW3, PW4, and PW5 have been updated to include the option of directing emissions through the existing thermal oxidizer, identified as OXD#7.

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

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

...

- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, ~~and controlled by~~ **modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, approved for construction in 2010, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, ~~and controlled by~~ **modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (fg) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. **PW4 was modified in 2014 to have the option of directing** ~~the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 will be controlled by~~ **to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (gh) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, with a projected solvent consumption rate of forty eight (48) gallons per day and ~~controlled by~~ **modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**

Change 2: The modified emission units have been updated in Section D.3. New conditions and revised conditions have also been added to this section.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, ~~and controlled by~~ **modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, approved for construction in 2010, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, ~~and controlled by~~ **modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (fg) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. **PW4 was modified in 2014 to have the option of directing** ~~the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 will be controlled by~~ **to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**
- (gh) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, with a projected solvent consumption rate of forty eight (48) gallons per day and ~~controlled by~~ **modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2, exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.**

Insignificant Activities:

- (eb) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to ~~[326 IAC 20-6], [326 IAC 8-3-2] and [326 IAC 8-3-58]~~

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

...

D.3.4 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.43.5 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

...

Compliance Determination Requirements

D.3.56 Volatile Organic Compounds (VOC)

...

D.3.67 Volatile Organic Compounds (VOC) Control

- (a) In order to comply with Condition D.3.3, the catalytic oxidizer OXD#2 shall be in operation and control emissions from the part washers at all times when the part washers are in operation **and directing emissions through OXD#2.**
- (b) **In order to comply with Condition D.3.3, the thermal oxidizer OXD#7 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#7.**

D.3.78 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Within 180 days after the ~~after the~~ issuance of this permit SSM 143-32975-00007, in order to demonstrate the compliance with Condition D.3.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#2. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.
- (b) **In order to demonstrate the compliance with Condition D.3.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7. The testing shall be conducted using methods approved by the Commissioner. The test shall be repeated at least once every 2.5 years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.**

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.89 Catalytic Incinerator Temperature

...

D.3.10 Thermal Oxidizer Temperature

- (a) **The Permittee shall determine the 3-hour average combustion zone temperature from the most recent valid stack test that demonstrates compliance with the minimum overall VOC control efficiency requirement in condition D.1.3, as approved by IDEM.**
- (b) **A continuous monitoring system shall be calibrated, maintained, and operated on OXD#7 for measuring combustion zone temperature. The output of the temperature monitoring system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the temperature determined in the most recent compliance test. A 3-hour average temperature that is below the temperature determined in the most recent compliance test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

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

D.3.911 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.3.3.
- (1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage in parts washer PW2 and PW3 for each month.
 - (5) The weight of VOC emitted for each compliance period.
 - (6) The following operation parameters of **the catalytic oxidizer incinerator and thermal oxidizer**:
 - (A) VOC capture efficiency;
 - ...

D.3.12 Record Keeping Requirements

To document compliance with Conditions D.3.4, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.**
- (b) The date of purchase.**
- (c) The type of solvent purchased.**
- (d) The total volume of the solvent purchased.**
- (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).**

D.3.1013 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.3.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

...

Other Changes

Change 1: 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 B - Advanced Source Modification Approval**, Section C - Risk Management Plan, the Facility Descriptions, **and Section D - Preventative Maintenance Plan.**

- A.1 General Information [326 IAC 2-7-4(c)] [~~326 IAC 2-7-5(15)~~ **(14)**] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary packaging rotogravure printing operation.
...
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[~~326 IAC 2-7-5(15)~~ **(14)**]
This stationary source consists of the following emission units and pollution control devices:
...
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[~~326 IAC 2-7-5(15)~~ **(14)**]
This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21), which are specifically regulated:
...
- 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]
(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
...
- B.11 Emergency Provisions [326 IAC 2-7-16]
...
(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.
...
- 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:
...
(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)**.
...

C.13 Risk Management Plan [326 IAC 2-7-5(~~12~~)(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.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Presses 1, 2, 4 and 5 Using Compliant Coating Material for 326 IAC 8 Compliance Purpose

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~)(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Presses 1, 2, 4 and 5 Using Oxidizers for 326 IAC 8 Compliance Purpose

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~)(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

D.3-45 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~)(12)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

SECTION E.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~)(14)]:

...

...

Change 2: IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping and IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

C.17 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.

...

Change 3: IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM and to clearly describe when new monitoring for new and existing units must begin.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(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(34).

~~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.~~

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

...

C.14 Response to Excursions or Exceedances **[40 CFR 64][326 IAC 3-8]** [326 IAC 2-7-5]
[326 IAC 2-7-6]

(i) 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.

(II)

- (a) **CAM Response to excursions or exceedances.**
 - (1) **Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
 - (2) **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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.**

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) **Elements of a QIP:**
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) **CAM recordkeeping requirements.**

 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) **Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements**

...

C.18 General Reporting Requirements [40 CFR 64][326 IAC 3-8][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(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) **Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;**
- (2) **Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and**
- (3) **A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.**

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

...

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: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-30351-00007

Months: _____ to _____ Year: _____

Page 1 of 2

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

...

Change 4: 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(~~34~~)(35), and

...

(c) A "responsible official" is defined at 326 IAC 2-7-1(~~34~~)(35).

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(~~34~~)(35).

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

...
(b) ...
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~~(34)~~(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~~(34)~~(35).

...

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~~(34)~~(35).

...

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(34)(35).

...

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(34)(35).

...

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(34)(35).

...

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

...

- (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(34)(35).

...

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(~~34~~)(35).

...

C.7 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(~~34~~)(35).

...

Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~34~~)(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(~~34~~)(35).

...

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

...

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(~~34~~)(35).

...

C.15 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(~~34~~)(35).

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

C.16 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(~~34~~)(35).

...

C.18 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. 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(~~34~~)(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

D.1.14 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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(~~34~~)(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

...

D.2.16 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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(~~34~~)(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

...

D.3.11 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.3.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. 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(~~34~~)(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

...

Change 5: IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.11 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.

Change 6: Item (b) of section A.3 has been modified to reference the correct rule site.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21), which are specifically regulated:

...

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, ~~326 IAC 8-3-2 or 326 IAC 8-3-5.~~[326 IAC 8-3-2][326 IAC 8-3-58]

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 143-34633-00007. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Tamera Wessel 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) 317-234-8530 or toll free at 1-800-451-6027 extension 4-8530.
- (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>.



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

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

TO: Aron Kratky
Multi-Color Corporation
2281 S US 31
Scottsburg, Indiana 47170

DATE: December 31, 2014

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

SUBJECT: Final Decision
Title V – Renewal
143-34633-00007

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:
Darin Brown, Plant Manager / Multi-Color Corporation
Maurice Lloyd / Alpha Omega Environmental
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



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

December 31, 2014

TO: Scott 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: Multi-Color Corporation
Permit Number: 143-34633-00007

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 12/31/2014 Multi-Color Corporation 143-34633-00007 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		Aron Kratky Multi-Color Corporation 2281 S US 31 Scottsburg IN 47170 (Source CAATS) confirmed delivery										
2		Darin Brown Plant Mgr Multi-Color Corporation 2281 S US 31 Scottsburg IN 47170 (RO CAATS)										
3		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 (Health Department)										
4		Scottsburg City Council and Mayors Office 2 E. McLain Street Scottsburg IN 47170 (Local Official)										
5		Scott Co Public Library 108 S Main St Scottsburg IN 47170-1892 (Library)										
6		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)										
7		Maurice Lloyd Alpha-Omega Environmental PO Box 910965 Lexington KY 40591 (Consultant)										
8		Jim Binkley Scottsburg Electric Department 2162 South US 31 Scottsburg IN 47170 (Affected Party)										
9		Resident 2129 South US 31 Scottsburg IN 47170 (Affected Party)										
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.
8			