



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Avery Dennison in Hancock County

Significant Source Modification No. 059-40465-00018
Significant Permit Modification No. 059-40479-00018

The Indiana Department of Environmental Management (IDEM) has received an application from Avery Dennison located at 870 West Anderson Blvd., Greenfield, IN 46140 for a significant modification of its Part 70 Operating Permit issued on August 25, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Avery Dennison to make certain changes at its existing source. Avery Dennison has applied to request addition of a new pressure sensitive coating operation, GF-3, and associated insignificant emission units. The source has also applied for the removal of two existing boilers.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Hancock County Public Library
900 W. McKenzie Road
Greenfield, IN 46140

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM No. 059-40465-00018 and SPM No. 059-40479-00018 in all correspondence.

Comments should be sent to:

Bharathi Bhattu
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8507
Or dial directly: (317) 234-8507
Fax: (317) 232-6749 attn: Bharathi Bhattu
E-mail: bbhattu@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Bharathi Bhattu of my staff at the above address.



Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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Mr. Tyler Nestleroad
Avery Dennison
870 West Anderson Blvd.
Greenfield, IN 46140

Re: 059-40479-00018
Significant Permit Modification

Dear Mr. Nestleroad:

Avery Dennison was issued Part 70 Operating Permit Renewal No. T059-35690-00018 on August 25, 2015 for a stationary pressure sensitive paper coating and laminating operation located at 870 West Anderson Blvd., Greenfield, IN 46140. An application requesting changes to this permit was received on September 12, 2018. 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 attachment(s). 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 B: 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Attachment C : 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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.

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for

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permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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 regarding this matter, please contact Bharathi Bhattu, 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 at 317-234-8507 or (800) 451-6027, and ask for Bharathi Bhattu or (317) 234-8057.

Sincerely,

Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

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



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Part 70 Operating Permit (Renewal) OFFICE OF AIR QUALITY

**Avery Dennison
870 West Anderson Blvd.
Greenfield, Indiana 46140**

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

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

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

Operation Permit No.: T059-35690-00018	
Master Agency Interest ID.: 11475	
Issued by: Original signed by: Tripurari P. Sinha, Ph.D., Section Chief Permits Branch, Office of Air Quality	Issuance Date: August 25, 2015 Expiration Date: August 25, 2020

First Significant Modification No.: 059-40479-00018	
Issued by: Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: August 25, 2020

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SECTION A
SOURCE SUMMARY

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

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

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

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

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

This stationary source consists of the following emission units:

- (a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:
 - (1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;
 - (2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and
 - (3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

- (b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:
 - (1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1

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- (2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;
- (3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;
- (4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and
- (5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

- (c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:
- (1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
 - (2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;
 - (3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;
 - (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and
 - (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and
 - (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]

[Under 40 CFR 63, Subpart DDDDD, this is an existing affected source]

A.3 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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million

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(10,000,000) British thermal units per hour.

- (1) Six (6) natural gas-fired unit heaters, constructed in 1994, with a maximum heat input capacity of 0.13 MMBtu/hr each.
- (2) Twelve (12) natural gas-fired door heaters, constructed in 1994, with a maximum heat input capacity of 0.87 MMBtu/hr each.
- (3) Seven (7) natural gas-fired rotation heating units, constructed in 1994, with a maximum heat input capacity of 0.40 MMBtu/hr each.
- (4) Two (2) natural gas-fired roof top heating/cooling units, constructed in 2011, with a maximum heat input capacity of 0.40 MMBtu/hr each.
- (5) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2012, with a maximum heat input capacity of 0.15 MMBtu/hr.
- (6) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.35 MMBtu/hr.
- (7) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.50 MMBtu/hr. [326 IAC 6-2-4]
- (8) One (1) natural gas-fired roof top heating/ cooling unit, approved in 2018 for construction, with a maximum heat input capacity of 0.4 MMBtu/hr.
- (9) Six (6) natural gas-fired air makeup units, approved in 2018 for construction, with a total heat input capacity of 2.65 MMBtu/hr.
- (10) Three (3) natural gas-fired heaters, approved in 2018 for construction, with a total heat input capacity of 0.16 MMBtu/hr.
- (11) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.25 MMBtu/hr.
- (12) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.10 MMBtu/hr.
- (13) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.30 MMBtu/hr.
- (14) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.03 MMBtu/hr.
- (15) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.175 MMBtu/hr.
- (16) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.225 MMBtu/hr.
- (17) Two (2) natural gas-fired air rotation units, approved in 2018 for construction, with a total heat input capacity of 3.125 MMBtu/hr.

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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).

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SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T059-35690-00018, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

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

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

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

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- (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.

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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 (PMP) 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 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).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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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

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

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

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

- (a) All terms and conditions of permits established prior to T059-35690-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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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(42). 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

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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

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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)(1) and (c)(1). 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(37)) 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.

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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)]

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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.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("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

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

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

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

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

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

- (1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;
- (2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and
- (3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

- (1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1
- (2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;
- (3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;
- (4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and
- (5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

- (1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
- (2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;
- (3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

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- (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and
- (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and
- (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The VOC input to coating operations GF-1, GF-2 and GF-3 shall be less than 243.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

Pursuant to 326 IAC 8-2-5, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, less water, from the coating lines, GF-1, GF-2, and GF-3.

D.1.3 Preventive Maintenance Plan

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

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

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish

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compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly report of the amount of VOC input and a quarterly summary of the information to document the compliance status with D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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

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SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]

[Under 40 CFR 63, Subpart DDDDD, this is an existing affected source]

Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (1) Six (6) natural gas-fired unit heaters, constructed in 1994, with a maximum heat input capacity of 0.13 MMBtu/hr each.
 - (2) Twelve (12) natural gas-fired door heaters, constructed in 1994, with a maximum heat input capacity of 0.87 MMBtu/hr each.
 - (3) Seven (7) natural gas-fired rotation heating units, constructed in 1994, with a maximum heat input capacity of 0.40 MMBtu/hr each.
 - (4) Two (2) natural gas-fired roof top heating/cooling units, constructed in 2011, with a maximum heat input capacity of 0.40 MMBtu/hr each.
 - (5) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2012, with a maximum heat input capacity of 0.15 MMBtu/hr.
 - (6) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.35 MMBtu/hr.
 - (7) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.50 MMBtu/hr.
 - (8) One (1) natural gas-fired roof top heating/ cooling unit, approved in 2018 for construction, with a maximum heat input capacity of 0.4 MMBtu/hr.
 - (9) Six (6) natural gas-fired air makeup units, approved in 2018 for construction, with a total heat input capacity of 2.65 MMBtu/hr.
 - (10) Three (3) natural gas-fired heaters, approved in 2018 for construction, with a total heat input capacity of 0.16 MMBtu/hr.
 - (11) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.25 MMBtu/hr.
 - (12) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.10 MMBtu/hr.
 - (13) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.30 MMBtu/hr.

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- (14) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.03 MMBtu/hr.
 - (15) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.175 MMBtu/hr.
 - (16) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.225 MMBtu/hr.
 - (17) Two (2) natural gas-fired air rotation units, approved in 2018 for construction, with a total heat input capacity of 3.125 MMBtu/hr.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Particulate Emissions Limitation [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 following units shall be limited to Pt pound per MMBtu heat input, as follows:

Emission Unit	Pt (lb/MMBtu)
Boiler B-03	0.406
Six (6) Unit Heaters	0.434 (each)
Twelve (12) Door Heaters	0.434 (each)
Seven (7) Rotation Heating Units	0.434 (each)
Two (2) Roof Top Heating/Cooling Units (2011)	0.404 (each)
Roof Top Heating/Cooling Unit (2012)	0.404
Two (2) Roof Top Heating/Cooling Units (2014)	0.402 (each)
Roof top unit (2018)	0.437
Air make-up units (2018)	
Heaters (2018)	
Heater (2018)	
Heater (2018)	
Heater (2018)	
Propeller Unit (2018)	
Propeller Unit (2018)	
Propeller Unit (2018)	
Rotation heating units (2018)	

D.2.2 Preventive Maintenance Plan

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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SECTION E.1

Emissions Unit Description:

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]

[Under 40 CFR 63, Subpart DDDDD, this is an existing affected source]

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

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the above listed emissions units, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12] [40 CFR Part 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Dc, which are incorporated by reference as 326 IAC 12 (included as Attachment A to this permit), for the above listed emissions units as specified as follows.

- (1) 40 CFR 60.40c
(2) 40 CFR 60.41c
(3) 40 CFR 60.48c(a)
(4) 40 CFR 60.48c(g)
(5) 40 CFR 60.48c(i)
(6) 40 CFR 60.48c(j)

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SECTION E.2

Emissions Unit Description:

(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

- (1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;
- (2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and
- (3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

- (1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1
- (2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;
- (3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;
- (4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and
- (5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

- (1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
- (2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;
- (3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

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- (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and
- (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and
- (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

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

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

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the above listed emissions units, except as otherwise specified in 40 CFR Part 60, Subpart RR.
- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.2.2 Pressure Sensitive Tape and Label Surface Coating Operations NSPS [326 IAC 12] [40 CFR Part 60, Subpart RR]

Pursuant to 40 CFR Part 60, Subpart RR, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart RR, which are incorporated by reference as 326 IAC 12 (included as Attachment B to this permit), for the above listed emissions units as specified as follows.

- (1) 40 CFR 60.440
- (2) 40 CFR 60.441
- (3) 40 CFR 60.442(a)(1)
- (4) 40 CFR 60.443(a)
- (5) 40 CFR 60.443(f)
- (6) 40 CFR 60.443(j)
- (7) 40 CFR 60.444(a)
- (8) 40 CFR 60.445(a)
- (9) 40 CFR 60.445(d)
- (10) 40 CFR 60.445(h)
- (11) 40 CFR 60.446(a)
- (12) 40 CFR 60.446(c)
- (13) 40 CFR 60.447

SECTION E.3

**DRAFT
NESHAP**

Emissions Unit Description:

(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

- (1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;
- (2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and
- (3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

- (1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1
- (2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;
- (3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;
- (4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and
- (5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing 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.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart JJJJ, in accordance with the schedule in 40 CFR Part 63, Subpart JJJJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and

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reports to:

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

E.3.2 Paper and Other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ] [326 IAC 20-65]

Pursuant to 40 CFR Part 63, Subpart JJJJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJJJ, which are incorporated by reference as 326 IAC 20-65 (included as Attachment C to this permit), for the above listed emissions units, as specified as follows.

- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a)
- (5) 40 CFR 63.3320(b)(2)
- (6) 40 CFR 63.3320(b)(3)
- (7) 40 CFR 63.3320(c)
- (8) 40 CFR 63.3330(a)
- (9) 40 CFR 63.3340
- (10) 40 CFR 63.3360(c)
- (11) 40 CFR 63.3360(d)
- (12) 40 CFR 63.3370(a)(1)
- (13) 40 CFR 63.3370(a)(2)
- (14) 40 CFR 63.3370(a)(3)
- (15) 40 CFR 63.3370(b)
- (16) 40 CFR 63.3370(c)
- (17) 40 CFR 63.3370(d)
- (18) 40 CFR 63.3370(l)
- (19) 40 CFR 63.3370(n)(4)
- (20) 40 CFR 63.3370(n)(5)
- (21) 40 CFR 63.3370(n)(6)
- (22) 40 CFR 63.3400(a)
- (23) 40 CFR 63.3400(b)(1)
- (24) 40 CFR 63.3400(c)
- (25) 40 CFR 63.3400(e)
- (26) 40 CFR 63.3400(g)
- (27) 40 CFR 63.3410(a)(1)(iii)
- (28) 40 CFR 63.3410(a)(1)(iv)
- (29) 40 CFR 63.3410(a)(1)(vi)
- (30) 40 CFR 63.3420
- (31) Table 2 to 40 CFR 63, Subpart JJJJ

SECTION E.4

**DRAFT
NESHAP**

Emissions Unit Description:

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]

[Under 40 CFR 63, Subpart DDDDD, this is an existing 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.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.7565, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart DDDDD, in accordance with the schedule in 40 CFR Part 63, Subpart DDDDD.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.4.2 Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [40 CFR Part 63, Subpart DDDDD] [326 IAC 20-95]

Pursuant to 40 CFR Part 63, Subpart DDDDD, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart DDDDD, which are incorporated by reference as 326 IAC 20-95 (included as Attachment D to this permit), for the above listed emissions units, as specified as follows.

- (1) 40 CFR 63.7480
- (2) 40 CFR 63.7485
- (3) 40 CFR 63.7490(a)(1)
- (4) 40 CFR 63.7490(d)
- (5) 40 CFR 63.7495(b)
- (6) 40 CFR 63.7495(d)
- (7) 40 CFR 63.7499(l)
- (8) 40 CFR 63.7500(a)
- (9) 40 CFR 63.7500(e)
- (10) 40 CFR 63.7505(a)
- (11) 40 CFR 63.7510(e)
- (12) 40 CFR 63.7515(d)
- (13) 40 CFR 63.7530(d)
- (14) 40 CFR 63.7530(e)
- (15) 40 CFR 63.7530(f)
- (16) 40 CFR 63.7540(a)(10)

Permit Reviewer: Julie Mendez, Ph.D.

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- (17) 40 CFR 63.7545(a)
- (18) 40 CFR 63.7545(b)
- (19) 40 CFR 63.7545(e)
- (20) 40 CFR 63.7550(a)
- (21) 40 CFR 63.7550(b)
- (22) 40 CFR 63.7550(h)(3)
- (23) 40 CFR 63.7555(a)
- (24) 40 CFR 63.7560
- (25) 40 CFR 63.7565
- (26) 40 CFR 63.7570
- (27) 40 CFR 63.7575
- (28) Table 3 to 40 CFR 63, Subpart DDDDD
- (29) Table 9 to 40 CFR 63, Subpart DDDDD
- (30) Table 10 to 40 CFR 63, Subpart DDDDD

SECTION E.5

**DRAFT
NESHAP**

Emissions Unit Description:

- (c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:
- (1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
 - (2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;
 - (3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;
 - (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and
 - (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and
 - (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

- (a) Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart JJJJ, in accordance with the schedule in 40 CFR Part 63, Subpart JJJJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.5.2 Paper and Other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ] [326 IAC 20-65]

Pursuant to 40 CFR Part 63, Subpart JJJJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJJJ, which are incorporated by reference as 326 IAC 20-65 (included as Attachment C to this permit), for the above listed emissions units, as specified as follows.

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- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a)
- (5) 40 CFR 63.3320(b)(2)
- (6) 40 CFR 63.3320(b)(3)
- (7) 40 CFR 63.3320(c)
- (8) 40 CFR 63.3330(b)
- (9) 40 CFR 63.3340
- (10) 40 CFR 63.3360(c)
- (11) 40 CFR 63.3360(d)
- (12) 40 CFR 63.3370(a)(1)
- (13) 40 CFR 63.3370(a)(2)
- (14) 40 CFR 63.3370(a)(3)
- (15) 40 CFR 63.3370(b)
- (16) 40 CFR 63.3370(c)
- (17) 40 CFR 63.3370(d)
- (18) 40 CFR 63.3370(l)
- (19) 40 CFR 63.3370(n)(4)
- (20) 40 CFR 63.3370(n)(5)
- (21) 40 CFR 63.3370(n)(6)
- (22) 40 CFR 63.3400(a)
- (23) 40 CFR 63.3400(b)(2)
- (24) 40 CFR 63.3400(c)
- (25) 40 CFR 63.3400(e)
- (26) 40 CFR 63.3400(g)
- (27) 40 CFR 63.3410(a)(1)(iii)
- (28) 40 CFR 63.3410(a)(1)(iv)
- (29) 40 CFR 63.3410(a)(1)(vi)
- (30) 40 CFR 63.3420
- (31) Table 2 to 40 CFR 63, Subpart JJJJ

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

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-35690-00018

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-35690-00018

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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:

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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: _____

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

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-35690-00018
Facility: GF-1, GF-2 and GF-3
Parameter: VOC input
Limit: Less than 243.1 tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
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: _____

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

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-35690-00018

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>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	Avery Dennison
Source Location:	870 West Anderson Blvd., Greenfield, IN 46140
County:	Hancock
SIC Code:	2672 (Coated and Laminated Paper, Not Elsewhere Classified)
Operation Permit No.:	T059-35690-00018
Operation Permit Issuance Date:	August 25, 2015
Significant Source Modification No.:	059-40465-00018
Significant Permit Modification No.:	059-40479-00018
Permit Reviewer:	Bharathi Bhattu

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T059-35690-00018 on August 25, 2015. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Hancock County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard, which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Hancock County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

Greenhouse Gas (GHG) Emissions

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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:

Process/ Emission Unit	Source-Wide Emissions Before Modification (ton/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Coating Operation GF-1	-	-	-	-	-	243.3	-	184.00	176 (Vinyl Acetate)
Coating Operation GF-2	-	-	-	-	-		-	218.04	
Drying Ovens Associated with GF-1	0.40	1.59	1.59	0.13	20.91	1.15	17.57	0.39	0.38 (Hexane)
Drying Ovens Associated with GF-2	0.59	2.35	2.35	0.19	30.86	1.70	25.92	0.58	0.56 (Hexane)
Boiler B-01	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08 (Hexane)
Boiler B-02	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08 (Hexane)
Boiler B-03	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08 (Hexane)
Insignificant Activities	9.19	9.58	9.58	0.04	6.79	3.13	5.71	0.15	0.12 (Hexane)
Total for Source	10.43	14.51	14.51	0.43	71.71	249.9	60.24	182	176 (Vinyl Acetate)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
*Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a regulated air pollutant. **PM _{2.5} listed is direct PM _{2.5} .									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant 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 equal to or greater than ten (10) tons per year for a single HAP and equal to or 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 Technical Support Document for Part 70 Operating Permit Renewal No. T059-35690-00018.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Avery Dennison on September 12, 2018, relating to addition of a new pressure sensitive coating operation, GF-3, and associated insignificant emission units. The source has also applied for the removal of two existing boilers.

The following is a list of the proposed emission units:

- (c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:
- (1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
 - (2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;
 - (3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;
 - (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and
 - (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and
 - (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

Insignificant activities:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (1) One (1) natural gas-fired roof top heating/ cooling unit, approved in 2018 for construction, with a maximum heat input capacity of 0.4 MMBtu/hr.
 - (2) Six (6) natural gas-fired air makeup units, approved in 2018 for construction, with a total heat input capacity of 2.65 MMBtu/hr.
 - (3) Three (3) natural gas-fired heaters, approved in 2018 for construction, with a total heat input capacity of 0.16 MMBtu/hr.
 - (4) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.25 MMBtu/hr.
 - (5) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.10 MMBtu/hr.
 - (6) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.30 MMBtu/hr.
 - (7) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.03 MMBtu/hr.
 - (8) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.175 MMBtu/hr.
 - (9) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.225 MMBtu/hr.
 - (10) Two (2) natural gas-fired air rotation units, approved in 2018 for construction, with a total heat input capacity of 3.125 MMBtu/hr.

- (c) Forced and induced draft cooling tower systems not regulated under a NESHAP.
 - (1) Three (3) cooling towers, approved in 2018 for construction. each with a maximum recirculation rate of 990 gallons per minute.
- (d) Water based activities, including the following:
 - (1) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
 - (A) Seven (7) water-based emulsion adhesive storage tanks, approved in 2018 for construction, each with a maximum capacity of 13,500 gallons.
 - (B) One (1) emulsion wastewater storage tank, approved in 2018 for construction, with a maximum capacity of 10,000 gallons.
- (e) Two (2) slitters, approved in 2018 for construction, with a total maximum throughput of 0.02 tons of trim material per hour.

The following is a list of the emission units removed from the source:

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

[Under 40 CFR 60, Subpart Dc, these are affected facilities]

[Under 40 CFR 63, Subpart DDDDD, these are existing affected sources]

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally

enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Combined HAPs
Coater Emissions GF-3	-	-	-	-	-	106.28	-	8.48	9.11
NG Combustion	0.18	0.70	0.70	0.06	9.22	0.51	7.74	0.17	0.17
Cooling Tower	2.34	2.34	2.34	-	-	-	-	-	-
Storage Tanks	-	-	-	-	-	0.04	-	1.77E-03	1.77E-03
Slitter	0.19	0.19	0.19	-	-	-	-	-	-
Total:	2.71	3.24	3.24	0.06	9.22	106.83	7.74	9.29	8.48

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

- (a) Approval to Construct
 Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at greater than or equal to twenty-five (25) tons per year.
- (b) Approval to Operate
 Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification requires revision to emissions limitation, new monitoring and record keeping requirements.

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/year)						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Coater Emissions GF-3*	-	-	-	-	-	106.28	-
NG Combustion	0.18	0.70	0.70	0.06	9.22	0.51	7.74
Cooling Tower	2.34	2.34	2.34	-	-	-	-
Storage Tanks	-	-	-	-	-	0.04	-
Slitter	0.19	0.19	0.19	-	-	-	-
Total for Modification	2.71	3.24	3.24	0.06	9.22	106.83	7.74
PSD Major Source Thresholds	250	250	250	250	250	250	250
*Coating lines GF-1, GF-2 and GF-3 shall limit the combined VOC emissions to be less than 243.1 tons/yr							

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

Process/ Emission Unit	Source-Wide Emissions after Issuance (ton/year)								Single Worst HAP**	Combined HAPs
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO			
Coating Operation GF-1	-	-	-	-	-	243.1	-	179.12 (Vinyl Acetate)	184.00	
Coating Operation GF-2	-	-	-	-	-		-	212.26 (Vinyl Acetate)	218.04	
Coating Operation GF-3	-	-	-	-	-		-	8.48 (Vinyl Acetate)	9.11	
Drying Ovens Associated with GF-1	0.40	1.59	1.59	0.13	20.91	1.15	17.57	0.38 (Hexane)	0.39	
Drying Ovens Associated with GF-2	0.59	2.35	2.35	0.19	30.86	1.70	25.92	0.56 (Hexane)	0.58	
Boiler B-03	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08 (Hexane)	0.08	
NG Comb.	0.30	1.22	1.22	0.10	16.01	0.88	13.45	0.29 (Hexane)	0.30	
Cooling Towers	8.03	8.03	8.03	-	-	-	-	-	-	
Storage Tanks	-	-	-	-	-	0.07	-	0.01 (Vinyl Acetate)	0.02	
Shot Blasting	3.38	3.38	3.38	-	-	-	-	-	-	
Silicone Batching	-	-	-	-	-	2.74	-	-	-	
Slitter	0.19	0.19	0.19	-	-	-	-	-	-	
Total for Source	12.97	17.09	17.09	0.43	72.16	249.87	60.62	399.87 (Vinyl Acetate)	412.53	
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-	

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

**Venyl Acetate is the single worst HAP.

This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

This existing Title V major HAP stationary source will continue to be a major source of HAPs, as defined in 40 CFR 63.2, because the unlimited potential to emit HAPs is equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (a) The VOC emissions from the three coating operations GF-1, GF-2, and GF-3 shall be less than 243.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the 40 CFR 60, Subpart Kb, New Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, which is incorporated by reference as (326 IAC 12), are not applicable to the source, because each of the Seven (7) water-based emulsion adhesive storage tanks, one (1) emulsion wastewater storage tank, at this source has a maximum storage capacity that is less than the applicability requirements found under 40 CFR 60.110b (a) (19,813 gallons/75 cubic meters).
- (b) The one (1) pressure sensitive paper coating operation, identified as GF-3 is subject to the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60.440, Subpart RR), which is incorporated by reference as 326 IAC 12, because the coating operation GF-3 will commence construction after the applicability date, December 30, 1980.

The pressure sensitive paper coating operations, identified as GF-3 is subject to the following portions of Subpart RR.

- (1) 40 CFR 60.440
 - (2) 40 CFR 60.441
 - (3) 40 CFR 60.442(a)(1)
 - (4) 40 CFR 60.443(a)
 - (5) 40 CFR 60.443(f)
 - (6) 40 CFR 60.443(j)
 - (7) 40 CFR 60.444(a)
 - (8) 40 CFR 60.445(a)
 - (9) 40 CFR 60.445(d)
 - (10) 40 CFR 60.445(h)
 - (11) 40 CFR 60.446(a)
 - (12) 40 CFR 60.446(c)
 - (13) 40 CFR 60.447
- (c) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60.740, Subpart VVV, are not included in this permit modification for the one pressure sensitive paper coating operations, identified as GF-3 This rule applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. Pursuant to 40 CFR 60.741, polymeric coating of supporting substrates involves coating a supporting web other than paper, plastic film, metallic foil, or metal coil. The coatings at this source are applied to paper; therefore, the source does not perform polymeric coating of supporting substrates.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The one (1) pressure sensitive paper coating operation, identified as GF-3 is subject to the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (40 CFR 63.3280, Subpart JJJJ), which is incorporated by reference as 326 IAC 20-65. Construction of the pressure sensitive paper coating operations, identified as GF-3, commenced after the applicability date, September 13, 2000. Under 40 CFR 63, Subpart JJJJ, GF-3 is considered a new affected facility.

The pressure sensitive paper coating operations, identified as GF-3 is subject to the following portions of Subpart JJJJ.

- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a)
- (5) 40 CFR 63.3320(b)(2)
- (6) 40 CFR 63.3320(b)(3)
- (7) 40 CFR 63.3320(c)
- (8) 40 CFR 63.3330(b)
- (9) 40 CFR 63.3340
- (10) 40 CFR 63.3360(c)
- (11) 40 CFR 63.3360(d)
- (12) 40 CFR 63.3370(a)(1)
- (13) 40 CFR 63.3370(a)(2)
- (14) 40 CFR 63.3370(a)(3)
- (15) 40 CFR 63.3370(b)
- (16) 40 CFR 63.3370(c)
- (17) 40 CFR 63.3370(d)
- (18) 40 CFR 63.3370(l)
- (19) 40 CFR 63.3370(n)(4)
- (20) 40 CFR 63.3370(n)(5)
- (21) 40 CFR 63.3370(n)(6)
- (22) 40 CFR 63.3400(a)
- (23) 40 CFR 63.3400(b)(2)
- (24) 40 CFR 63.3400(c)
- (25) 40 CFR 63.3400(e)
- (26) 40 CFR 63.3400(g)
- (27) 40 CFR 63.3410(a)(1)(iii)
- (28) 40 CFR 63.3410(a)(1)(iv)
- (29) 40 CFR 63.3410(a)(1)(vi)
- (30) 40 CFR 63.3420
- (31) Table 2 to 40 CFR 63, Subpart JJJJ

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJJJ.

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, Subpart OOOO are not included in this modification for the pressure sensitive paper coating operations, identified as GF-3, because the coating operation GF-3 is part of the affected source of 40 CFR 63, Subpart JJJJ and therefore not subject to the requirements of this rule.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

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

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)

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

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2020, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 9-1 (Carbon Monoxide Emission Requirements)

This source does not have any carbon monoxide (CO) emissions limit under 326 IAC 9-1-2; therefore, the source is not subject to the requirements of this rule.

326 IAC 10 (Nitrogen Oxide Rules)

- (a) This source is located in Hancock County. Therefore, pursuant to 326 IAC 10-1-1(a), the requirements of 326 IAC 10-1 (Nitrogen Oxide Controls in Clark and Floyd Counties) are not applicable.
- (b) This source is not specifically listed in 326 IAC 10-3-1. Therefore, the requirements of 326 IAC 10-3-1 (Nitrogen Oxide Reduction Program for Specific Source Categories) are not applicable.

Coating operation GF-3

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

The operation of paper coating operation GF-3 will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Pursuant to 326 IAC 6-3-1(b)(6) and 326 IAC 6-3-1(b)(7), the paper coating operation GF-3 is exempt from the requirements of 326 IAC 6-3-2, because the facility utilizes roll coating and flow coating.

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

The paper coating operation GF-3 is subject to this rule because the coating line will commence construction after January 1, 1980, has potential emissions of twenty-five (25) tons or greater per year of VOC, and coats paper. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Natural Gas-Fired Indirect Units:

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

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date (Removal Date)	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Boiler B-01	1994 (removed 2018)	40.205	34.43	0.434	0.434	0.0019
Boiler B-02	1994 (removed 2018)	40.205				
Unit heaters	1994	0.78				
Door heaters		10.44				
Rotation heating units		2.80				
Boiler B-03	2000	10.20	44.63	0.406	0.406	0.0019
Roof top units	2011	0.80	45.43	0.404	0.404	
Roof top unit	2012	0.15	45.58	0.404	0.404	
Roof top unit	2014	0.35	46.43	0.402	0.402	
Roof top unit		0.50				
Roof top unit		0.4				
Air make-up units	2018	2.65	33.43	0.437	0.437	
Heaters		0.16				
Heater		0.25				
Heater		0.10				
Heater		0.30				
Propeller Unit		0.03				
Propeller Unit		0.17				
Propeller Unit		0.22				
Rotation heating units	3.12					

Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Each of the natural gas fired units above have PM emissions of 0.0019 lb/MMBtu, therefore each is in compliance with 326 IAC 6-2 without the use of a control device.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Each natural-gas combusting unit is not subject to 326 IAC 7-1.1 because the potential to emit SO₂ of each unit is less than 25 tons per year or 10 pounds per hour.

Natural gas fired dryers

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

The natural gas fired dryers are not subject to the requirements of 326 IAC 6-2, since the dryers are the sources of direct heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. Therefore, natural gas fired dryers are exempt from the requirements of 326 IAC 6-3

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the dryers combusting natural gas are not subject to the requirements of 326 IAC 7-1, since the dryers have uncontrolled sulfur dioxide (SO₂) emissions less than twenty-five (25)

tons per year and ten (10) pounds per hour, each.

Cooling Towers

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

Pursuant to 326 IAC 6-3-1(b)(11), the non-contact cooling towers are exempt from the particulate emission limitations for manufacturing processes identified in 326 IAC 6-3-2.

Slitters

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

Pursuant to 326 IAC 6-3-1(b)(14), the two (2) slitters are exempt from the particulate emission limitations identified in 326 IAC 6-3-2, because the potential emissions of each slitter are less than 0.551 pounds per hour.

Compliance Determination and Monitoring Requirements

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

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

There are no new or modified compliance requirements included with this modification.

Proposed Changes

The following changes listed below are due to the proposed modification. Deleted language appears as ~~struck through~~ text and new language appears as **bold** text:

- (1) IDEM OAQ has added new equipment to the list of emission units under section A.2 and to the list of insignificant activities under section A.3.
- (2) IDEM OAQ has removed few emission units from the list under section A.2 as these emission units are no longer on-site.
- (3) IDEM OAQ has modified sections D.1, D.2, E.2 and E.4 in the permit in order to reflect the addition of new emission units to the source and removal of existing emission units from the source and as part of this modification.
- (4) IDEM OAQ has added section E.5 to the permit after determining the state and federal rules applicability to the new emission units.
- (5) IDEM OAQ has updated the quarterly report form in order to add the new facility (GF-3) to track VOC input.

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) IDEM OAQ has included IDEM's Master Agency Interest Identification (ID) number of 11475 in the permit cover page signature box.
- (2) The SIC Code description was added to Subsection A.1.
- (3) IDEM OAQ has updated the language under condition D.1.6 as per latest model language.

The permit has been modified as follows:

Operation Permit No.: T059-35690-00018 Master Agency Interest ID: 11475	
Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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

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

Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
General Source Phone Number: (317) 467-6960
SIC Code: 2672 **(Coated and Laminated Paper, Not Elsewhere Classified)**

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:

- (c) **One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:**
 - (1) **Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;**
 - (2) **One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;**
 - (3) **One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;**

- (4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and**
- (5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and**
- (6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.**

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]
[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

~~Under 40 CFR 60, Subpart Dc, these are affected facilities. Under 40 CFR 63, Subpart DDDDD, these are existing affected sources.~~

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 ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (8) One (1) natural gas-fired roof top heating/ cooling unit, approved in 2018 for construction, with a maximum heat input capacity of 0.4 MMBtu/hr.**
- (9) Six (6) natural gas-fired air makeup units, approved in 2018 for construction, with a total heat input capacity of 2.65 MMBtu/hr.**
- (10) Three (3) natural gas-fired heaters, approved in 2018 for construction, with a total heat input capacity of 0.16 MMBtu/hr.**
- (11) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.25 MMBtu/hr.**
- (12) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.10 MMBtu/hr.**
- (13) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.30 MMBtu/hr.**
- (14) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.03 MMBtu/hr.**
- (15) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.175 MMBtu/hr.**
- (16) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.225 MMBtu/hr.**

- (17) **Two (2) natural gas-fired air rotation units, approved in 2018 for construction, with a total heat input capacity of 3.125 MMBtu/hr.**

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) **One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:**
- (1) **Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;**
 - (2) **One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;**
 - (3) **One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;**
 - (4) **One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and**
 - (5) **One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and**
 - (6) **One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.**

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the VOC input to coating operations GF-1, ~~and GF-2~~ **and GF-3** shall be less than ~~243.3~~**243.1** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Pursuant to 326 IAC 8-2-5, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, less water, ~~as delivered to the applicator for from the~~ **a paper, plastic, metal foil, or pressure sensitive tape/labels coating lines, GF-1, GF-2, and GF-3.**

D.1.6 Reporting Requirements

~~A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported.~~

~~Section C – General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition.~~ A quarterly report of the amount of VOC input and a quarterly summary of the information to document the compliance status with D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition.

The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

~~[Under 40 CFR 60, Subpart Dc, these are affected facilities]~~

~~[Under 40 CFR 63, Subpart DDDDD, these are existing affected sources]~~

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]

[Under 40 CFR 63, Subpart DDDDD, this is an existing affected source]

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(8) One (1) natural gas-fired roof top heating/ cooling unit, approved in 2018 for construction, with a maximum heat input capacity of 0.4 MMBtu/hr.

(9) Six (6) natural gas-fired air makeup units, approved in 2018 for construction, with a total heat input capacity of 2.65 MMBtu/hr.

(10) Three (3) natural gas-fired heaters, approved in 2018 for construction, with a total heat input capacity of 0.16 MMBtu/hr.

(11) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.25 MMBtu/hr.

(12) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.10 MMBtu/hr.

(13) One (1) natural gas-fired heater, approved in 2018 for construction, with a heat input capacity of 0.30 MMBtu/hr.

(14) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.03 MMBtu/hr.

(15) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a heat input capacity of 0.175 MMBtu/hr.

(16) One (1) natural gas-fired propeller unit, approved in 2018 for construction, with a

heat input capacity of 0.225 MMBtu/hr.

(17) Two (2) natural gas-fired air rotation units, approved in 2018 for construction, with a total heat input capacity of 3.125 MMBtu/hr.

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

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

D.2.1 Particulate Emissions Limitation [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 following units shall be limited to Pt pound per MMBtu heat input, as follows:

Emission Unit	Pt (lb/MMBtu)
Boiler B-01	0.434
Boiler B-02	0.434
Boiler B-03	0.406
Six (6) Unit Heaters	0.434 (each)
Twelve (12) Door Heaters	0.434 (each)
Seven (7) Rotation Heating Units	0.434 (each)
Two (2) Roof Top Heating/Cooling Units (2011)	0.404 (each)
Roof Top Heating/Cooling Unit (2012)	0.404
Two (2) Roof Top Heating/Cooling Units (2014)	0.402 (each)
Roof top unit (2018)	0.437
Air make-up units (2018)	
Heaters (2018)	
Heater (2018)	
Heater (2018)	
Heater (2018)	
Propeller Unit (2018)	
Propeller Unit (2018)	
Propeller Unit (2018)	
Rotation heating units (2018)	

SECTION E.1

NSPS

Emissions Unit Description:

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

~~[Under 40 CFR 60, Subpart Dc, these are affected facilities]
 [Under 40 CFR 63, Subpart DDDDD, these are existing affected sources]~~

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

[Under 40 CFR 60, Subpart Dc, this is an affected facility]
 [Under 40 CFR 63, Subpart DDDDD, this is an existing affected source]

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

SECTION E.2 NSPS

Emissions Unit Description:

- (c) **One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:**
- (1) **Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;**
 - (2) **One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;**
 - (3) **One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;**
 - (4) **One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and**
 - (5) **One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and**
 - (6) **One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.**

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

SECTION E.4

NESHAP

Emissions Unit Description:

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

~~[Under 40 CFR 60, Subpart Dc, these are affected facilities]~~

~~[Under 40 CFR 63, Subpart DDDDD, these are existing affected sources]~~

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

SECTION E.5

NESHAP

Emissions Unit Description:

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;

(2) One (1) roll coating operation, approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;

(3) One (1) curtain coating operation; approved in 2018 for construction, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

(4) One (1) natural gas-fired Silicone Dryer, approved in 2018 for construction, with a maximum heat input capacity of 3.65 MMBtu/hr; and

(5) One (1) natural gas-fired Adhesive Dryer, approved in 2018 for construction, with a maximum heat input capacity of 8.09 MMBtu/hr; and

(6) One (1) natural gas-fired Face Dryer, approved in 2018 for construction, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

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

- (a) Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart JJJJ, in accordance with the schedule in 40 CFR Part 63, Subpart JJJJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.5.2 Paper and Other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ] [326 IAC 20-65]

Pursuant to 40 CFR Part 63, Subpart JJJJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJJJ, which are incorporated by reference as 326 IAC 20-65 (included as Attachment C to this permit), for the above listed emissions units, as specified as follows.

- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a)
- (5) 40 CFR 63.3320(b)(2)
- (6) 40 CFR 63.3320(b)(3)
- (7) 40 CFR 63.3320(c)
- (8) 40 CFR 63.3330(b)
- (9) 40 CFR 63.3340
- (10) 40 CFR 63.3360(c)
- (11) 40 CFR 63.3360(d)
- (12) 40 CFR 63.3370(a)(1)
- (13) 40 CFR 63.3370(a)(2)
- (14) 40 CFR 63.3370(a)(3)
- (15) 40 CFR 63.3370(b)
- (16) 40 CFR 63.3370(c)
- (17) 40 CFR 63.3370(d)
- (18) 40 CFR 63.3370(l)
- (19) 40 CFR 63.3370(n)(4)
- (20) 40 CFR 63.3370(n)(5)
- (21) 40 CFR 63.3370(n)(6)
- (22) 40 CFR 63.3400(a)
- (23) 40 CFR 63.3400(b)(2)
- (24) 40 CFR 63.3400(c)
- (25) 40 CFR 63.3400(e)
- (26) 40 CFR 63.3400(g)
- (27) 40 CFR 63.3410(a)(1)(iii)
- (28) 40 CFR 63.3410(a)(1)(iv)
- (29) 40 CFR 63.3410(a)(1)(vi)
- (30) 40 CFR 63.3420
- (31) Table 2 to 40 CFR 63, Subpart JJJJ

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

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-35690-00018
Facility: GF-1, and GF-2 and GF-3
Parameter: VOC input
Limit: Less than ~~243.3~~ **243.1** tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
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: _____

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 12, 2018.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 059-40465-00018. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 059-40479-00018.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bharathi Bhattu at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234 - 8507 or toll free at 1-800-451-6027, extension 4-8507.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Uncontrolled Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Coating Operation GF-1	-	-	-	-	-	247.29	-	184.00	179.12	Vinyl Acetate
Coating Operation GF-2	-	-	-	-	-	293.03	-	218.04	212.26	Vinyl Acetate
Coating Operation GF-3	-	-	-	-	-	106.28	-	9.11	8.48	Vinyl Acetate
Drying Ovens Associated with GF-1	0.40	1.59	1.59	0.13	20.91	1.15	17.57	0.39	0.38	Hexane
Drying Ovens Associated with GF-2	0.59	2.35	2.35	0.19	30.86	1.70	25.92	0.58	0.56	Hexane
Boiler B-03	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08	Hexane
Natural Gas Combustion**	0.30	1.22	1.22	0.10	16.01	0.88	13.45	0.30	0.29	Hexane
Cooling Towers	8.03	8.03	8.03	-	-	-	-	-	-	-
Storage Tanks	-	-	-	-	-	0.07	-	0.02	0.01	Vinyl Acetate
Shot Blasting	3.38	3.38	3.38	-	-	-	-	-	-	-
Silicone Batching	-	-	-	-	-	2.74	-	-	-	-
Slitter	0.19	0.19	0.19	-	-	-	-	-	-	-
Total	12.97	17.09	17.09	0.43	72.16	653.37	60.62	412.53	399.87	Vinyl Acetate

* PM2.5 listed is direct PM2.5

**Includes natural gas fired dryers for coating operation, GF-3

Controlled Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Coating Operation GF-1	-	-	-	-	-	247.29	-	184.00	179.12	Vinyl Acetate
Coating Operation GF-2	-	-	-	-	-	293.03	-	218.04	212.26	Vinyl Acetate
Coating Operation GF-3	-	-	-	-	-	106.28	-	9.11	8.48	Vinyl Acetate
Drying Ovens Associated with GF-1	0.40	1.59	1.59	0.13	20.91	1.15	17.57	0.39	0.38	Hexane
Drying Ovens Associated with GF-2	0.59	2.35	2.35	0.19	30.86	1.70	25.92	0.58	0.56	Hexane
Boiler B-03	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08	Hexane
Natural Gas Combustion**	0.30	1.22	1.22	0.10	16.01	0.88	13.45	0.30	0.29	Hexane
Cooling Towers	8.03	8.03	8.03	-	-	-	-	-	-	-
Storage Tanks	-	-	-	-	-	0.07	-	0.02	0.01	Vinyl Acetate
Shot Blasting	0.03	0.03	0.03	-	-	-	-	-	-	-
Silicone Batching	-	-	-	-	-	2.74	-	-	-	-
Slitter	0.19	0.19	0.19	-	-	-	-	-	-	-
Total	9.63	13.74	13.74	0.43	72.16	653.37	60.62	412.53	399.87	Vinyl Acetate

* PM2.5 listed is direct PM2.5

**Includes natural gas fired dryers for coating operation, GF-3

Limited Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs***	Worst Single HAP	
Coating Operation GF-1	-	-	-	-	-	243.1	-	184.00	179.12	Vinyl Acetate
Coating Operation GF-2	-	-	-	-	-		-	218.04	212.26	Vinyl Acetate
Coating Operation GF-3	-	-	-	-	-		-	9.11	8.48	Vinyl Acetate
Drying Ovens Associated with GF-1	0.40	1.59	1.59	0.13	20.91	1.15	17.57	0.39	0.38	Hexane
Drying Ovens Associated with GF-2	0.59	2.35	2.35	0.19	30.86	1.70	25.92	0.58	0.56	Hexane
Boiler B-03	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08	Hexane
Natural Gas Combustion**	0.30	1.22	1.22	0.10	16.01	0.88	13.45	0.30	0.29	Hexane
Cooling Towers	8.03	8.03	8.03	-	-	-	-	-	-	-
Storage Tanks	-	-	-	-	-	0.07	-	0.02	0.01	Vinyl Acetate
Shot Blasting	3.38	3.38	3.38	-	-	-	-	-	-	-
Silicone Batching	-	-	-	-	-	2.74	-	-	-	-
Slitter	0.19	0.19	0.19	-	-	-	-	-	-	-
Total	12.97	17.09	17.09	0.43	72.16	249.87	60.62	412.53	399.87	Vinyl Acetate

* PM2.5 listed is direct PM2.5

**Includes natural gas fired dryers for coating operation, GF-3

*** Limiting VOC effectively reduces HAP emissions proportionately. However, the values shown here for HAPs are unlimited.

Note: The shaded cells indicate where limits are included.

**AVERY DENNISON
MODIFICATION SUMMARY**

**Appendix A: Emissions Calculations
Modification Summary**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Emissions Source	Modification Potential Emissions (tons/yr)									
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Total HAPs	Single HAP	
Coater Emissions GF-3	-	-	-	-	-	106.28	-	9.11	8.48	Vinyl Acetate
NG Combustion	0.18	0.70	0.70	0.06	9.22	0.51	7.74	0.17	0.17	Hexane
Cooling Tower	2.34	2.34	2.34	-	-	-	-	-	-	
Storage Tanks	-	-	-	-	-	0.04	-	1.77E-03	1.77E-03	Vinyl Acetate
Slitter	0.19	0.19	0.19	-	-	-	-	-	-	
Total	2.71	3.24	3.24	0.06	9.22	106.83	7.74	9.29	8.48	

AVERY DENNISON

GF-3

EMISSION CALCULATIONS

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Press I.D.	Throughput (MMin ² /yr)
GF-3	1,614,044

Emission Unit	Coating	Maximum Coverage (lbs/MMin ²)	wt% VOC	wt% Vinyl Acetate	wt% Toluene	Emissions (tons/yr)			
						VOC	Vinyl Acetate	Toluene	Total HAPs
GF-3	25501	28.02	0.12%	0.00038	0.0028%	28.04	8.48	0.63	9.11
	New Charity	22.76	0.33%	0.00003	0.0028%	60.06	0.51	0.51	1.03
	S2550	32.71	0.00%	0.00003	0.0028%	0.00	0.74	0.74	1.48
	S692	29.02	0.12%	0.00003	0.0028%	27.09	0.66	0.66	1.31
	TruCut AT	28.02	0.47%	0.00003	0.0028%	106.28	0.63	0.63	1.27
Total						106.28	8.48	0.74	9.11

The Permittee uses different coating materials (only one material at a time) in the coating operation, GF-3. The worst-case material is identified in bold and taken for total.

METHODOLOGY

Potential to Emit (ton/yr) = Throughput (Mmin²/yr) x maximum Coverage (lb/Mmin²) x wt% VOC/HAP x 1 ton/2,000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
21.5	1020	184.4

Emission Unit	Total Heat Input Capacity (MMBtu/hr)
Roof Top Unit (1)	0.4
Make-Up Air Unit (6)	2.65
Heater (3)	0.16
Heaters (1)	0.25
Heater (1)	0.1
Heater (1)	0.3
Propeller Unit (1)	0.03
Propeller Unit (1)	0.175
Propeller Unit (1)	0.225
Air Rotation Units (2)	3.125
Gas Water Heaters (2)	0.8
GF-3 Silicone Dryer	3.635
GF-3 Adhesive Dryer	8.09
GF-3 Face Dryer	1.53
Total	21.47

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.18	0.70	0.70	0.06	**see below	0.51	7.74
					9.22		

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.9E-04	1.1E-04	6.9E-03	0.17	3.1E-04	0.17

	HAPs - Metals				Total - Metals	
	Lead	Cadmium	Chromium	Manganese		
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.6E-05	1.0E-04	1.3E-04	3.5E-05	1.9E-04	
					Total HAPs	0.17
					Worst HAP	0.17

Methodology is the same as above.

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

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

Appendix A: Emission Calculations**Cooling Towers
Particulate Matter**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Total liquid drift 0.02 % of recirculating flow

TDS content of recirculating water 1,800 ppm

Unit	Total circulating flow rate (gal/min)	Potential to Emit PM/PM10/PM2.5 (lb/hr)	Potential to Emit PM/PM10/PM2.5 (ton/yr)
Cooling Tower 1	1,800	0.32	1.42
Cooling Tower 2	1,800	0.32	1.42
Cooling Tower 3	1,800	0.32	1.42
Cooling Tower 4	1,800	0.32	1.42
Cooling Tower 5 (2018)	990	0.18	0.78
Cooling Tower 6 (2018)	990	0.18	0.78
Cooling Tower 7 (2018)	990	0.18	0.78

TDS = total dissolved solids

Assume TDS = PM = PM10 = PM2.5

Methodology

Total liquid drift (%) from AP-42, Table 13.4-1 (1/95)

Potential to Emit (lb/hr) = Total circulating flow rate (gal/min) * 60 min/hr * 8.345 lb/gal * Total liquid drift (%) / 100 * TSD content of recirculating water (lb / 1,000,000 lb)

Potential to Emit (ton/yr) = Potential to Emit (lb/hr) * 8760 hr/yr / 2000 lb/hr

**AVERY DENNISON
STORAGE TANK CALCULATIONS**

**Appendix A: Emission Calculations
Storage Tanks
VOC and HAPs**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Volatile Organic Compound (VOC) Emissions From Storage Tanks (Working and Breathing Losses) Using US EPA TANKS Version 4.09 program

Storage Tank ID	Tank Type	Tank Color/ Shade	Tank Dimensions	Maximum Liquid Volume (gal)	Turnovers per Year	Product Throughput (gal/yr)	VOC Working Losses (lbs/yr)	VOC Breathing Losses (lbs/yr)	Total VOC Losses (lbs/yr)	VOC Working Losses (tons/yr)	VOC Breathing Losses (tons/yr)	Total VOC Losses (tons/yr)	HAP Working Losses (tons/yr)	HAP Breathing Losses (tons/yr)	Total HAP Losses (tons/yr)	
GF-3 Tank 1	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 2	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 3	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 4	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 5	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 6	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
GF-3 Tank 7	Vertical Fixed Roof	Aluminum	Height: 16.67' Diameter: 12'	13,500	8	108000	8.21	4.34	12.55	4.10E-03	2.17E-03	6.27E-03	1.65E-04	8.74E-05	2.53E-04	Vinyl Acetate
Waste Water Tank	Vertical Fixed Roof	Aluminum		10,000	18.2	182000	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	
Total									87.82			0.04			1.77E-03	Vinyl Acetate

negl. = negligible

AVERY DENNISON
SLITTER EMISSION CALCULATIONS

Appendix A: Emission Calculations
Slitter

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Emission Unit	Maximum Throughput (tons/yr)	Emission Rate	Uncontrolled Emissions (tons/yr)
Slitter	193.44	0.10%	0.19

Methodology

PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Throughput (tons of trim waste/yr) x Emission Factor
Emission Factor is based on industry standard for percent of trim material that is dust: 0.10% by weight.

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Throughput (MMin ² /yr)
GF-1	2500	80	1,261,440

	Maximum Coverage (lb/MMin ²)	Weight % Organics	Weight % Vinyl Acetate	Weight % Formaldehyde	Weight % Methanol	Flash Off %	Potential to Emit (ton/yr)				
							VOC	Vinyl Acetate	Formaldehyde	Methanol	Total HAPs
Coating 1	71	0.50%	0.40%	-	-	100%	223.91	179.12	0.00	0.00	179.12
Coating 2	25.5	0.034%	-	0.0163%	0.014%	100%	5.47	0.00	2.62	2.25	4.87
Coating 3	2.84	1%	-	-	-	100%	17.91	0.00	0.00	0.00	0.00
Total							247.29	179.12	2.62	2.25	184.00

The Permittee uses several different coating recipes. The above coatings represent worst-case VOC and HAP content.

METHODOLOGY

Throughput (MMin²/yr) = Maximum line speed (ft/min) x 12 in./ft x Maximum print width (in.) x 60 min/hr x 8760 hr/yr x (1 MMin² / 1,000,000 in²)

Potential to Emit (ton/yr) = Maximum Coverage (lb/MMin²) x Weight % x Flash Off % x Throughput (MMin²/yr) / 2000 lb/ton

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Throughput (MMin ² /yr)
GF-2	3000	79	1,494,806

	Maximum Coverage (lb/MMin ²)	Weight % Organics	Weight % Vinyl Acetate	Weight % Formaldehyde	Weight % Methanol	Flash Off %	Potential to Emit (ton/yr)				
							VOC	Vinyl Acetate	Formaldehyde	Methanol	Total HAPs
Coating 1	71	0.50%	0.40%	-	-	100%	265.33	212.26	0.00	0.00	212.26
Coating 2	25.5	0.034%	-	0.0163%	0.014%	100%	6.48	0.00	3.11	2.67	5.77
Coating 3	2.84	1%	-	-	-	100%	21.23	0.00	0.00	0.00	0.00
Total							293.03	212.26	3.11	2.67	218.04

The Permittee uses several different coating recipes. The above coatings represent worst-case VOC and HAP content.

METHODOLOGY

Throughput (MMin²/yr) = Maximum line speed (ft/min) x 12 in./ft x Maximum print width (in.) x 60 min/hr x 8760 hr/yr x (1 MMin² / 1,000,000 in²)
 Potential to Emit (ton/yr) = Maximum Coverage (lb/MMin²) x Weight % x Flash Off % x Throughput (MMin²/yr) / 2000 lb/ton

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
48.7	1020	418.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.40	1.59	1.59	0.13	20.91	1.15	17.57

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Potential Emission in tons/yr	4.4E-04	2.5E-04	1.6E-02	3.8E-01	7.1E-04	3.9E-01

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Potential Emission in tons/yr	1.0E-04	2.3E-04	2.9E-04	7.9E-05	4.4E-04	1.1E-03

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Total HAPs	3.9E-01
Worst HAP	3.8E-01

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
71.86	1020	617.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.59	2.35	2.35	0.19	30.86	1.70	25.92

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Potential Emission in tons/yr	6.5E-04	3.7E-04	2.3E-02	5.6E-01	1.0E-03	5.8E-01

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Potential Emission in tons/yr	1.5E-04	3.4E-04	4.3E-04	1.2E-04	6.5E-04	1.7E-03

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Total HAPs	5.8E-01
Worst HAP	5.6E-01

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

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.205	1020	87.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.08	0.33	0.33	0.03	4.38	0.24	3.68

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.2E-05	5.3E-05	3.3E-03	7.9E-02	1.5E-04	8.2E-02

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.2E-05	4.8E-05	6.1E-05	1.7E-05	9.2E-05	2.4E-04

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Total HAPs	8.3E-02
Worst HAP	7.9E-02

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

Natural Gas-Fired Units Classified as Insignificant Activities

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

	Number of Units	Unit Heat Input Capacity (MMBtu/hr)	Heat Input Capacity (MMBtu/hr)
Unit heaters	6	0.13	0.78
Door heaters	12	0.87	10.44
Rotation heating units	7	0.40	2.8
Roof top heating/cooling units	2	0.40	0.8
	1	0.15	0.15
	1	0.35	0.35
	1	0.50	0.5
		15.82	

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
15.820	1020	135.9

Emission Factor in lb/MMCF	Pollutant						
	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.13	0.52	0.52	0.04	6.79	0.37	5.71

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	1.4E-04	8.2E-05	5.1E-03	1.2E-01	2.3E-04	1.3E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	3.4E-05	7.5E-05	9.5E-05	2.6E-05	1.4E-04	3.7E-04

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Total HAPs	1.3E-01
Worst HAP	1.2E-01

**Appendix A: Emission Calculations
Storage Tanks
VOC and HAPs**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Volatile Organic Compound (VOC) Emissions From Storage Tanks (Working and Breathing Losses) Using US EPA TANKS Version 4.09 program

Storage Tank ID	Product Stored	Tank Type	Tank Color/Shade	Tank Dimensions	Maximum Liquid Volume (gallons)	Turnovers per year	Product Throughput (gallons/yr)	VOC Working Losses (lbs/yr)	VOC Breathing Losses (lbs/yr)	Total VOC Losses (lbs/yr)	VOC Working Losses (tons/yr)	VOC Breathing Losses (tons/yr)	Total VOC Losses (tons/yr)	HAP Working Losses (tons/yr)	HAP Breathing Losses (tons/yr)	Total HAP Losses (tons/yr)	
GF-1 Tank 1	AT-20N	Vertical Fixed Roof	Aluminum/Specular	Height: 20.25', Diameter: 12'	16,400	27	442,800	5.82	0.29	6.11	2.9E-03	1.5E-04	3.1E-03	2.9E-03	1.5E-04	3.1E-03	Vinyl Acetate
GF-1 Tank 2	AT-20	Vertical Fixed Roof	Aluminum/Specular	Height: 20.25', Diameter: 12'	16,400	27	442,800	5.82	0.29	6.11	2.9E-03	1.5E-04	3.1E-03	2.9E-03	1.5E-04	3.1E-03	Vinyl Acetate
GF-1 Tank 3	AT-20	Vertical Fixed Roof	Aluminum/Specular	Height: 20.25', Diameter: 12'	16,400	101	1,656,400	10.10	0.29	10.39	5.1E-03	1.5E-04	5.2E-03	5.1E-03	1.5E-04	5.2E-03	Vinyl Acetate
GF-1 Tank 4	S2501	Vertical Fixed Roof	Aluminum/Specular	Height: 20.25', Diameter: 12'	16,400	14.5	237,800	3.13	0.29	3.42	1.6E-03	1.5E-04	1.7E-03	1.6E-03	1.5E-04	1.7E-03	Vinyl Acetate
GF-1 Tank 5	S2501M	Vertical Fixed Roof	Aluminum/Specular	Height: 20.25', Diameter: 12'	16,400	14.5	237,800	3.13	0.29	3.42	1.6E-03	1.5E-04	1.7E-03	1.6E-03	1.5E-04	1.7E-03	Vinyl Acetate
GF-2 Tank 1	S2501	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	38.5	500,500	6.23	0.29	6.52	3.1E-03	1.5E-04	3.3E-03	3.1E-03	1.5E-04	3.3E-03	Vinyl Acetate
GF-2 Tank 2	AT-20N	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	3.8	49,400	0.65	0.29	0.94	3.3E-04	1.5E-04	4.7E-04	3.3E-04	1.5E-04	4.7E-04	Vinyl Acetate
GF-2 Tank 3	S692	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	4.8	62,400	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
GF-2 Tank 4	S9010N	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	12	156,000	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
GF-2 Tank 5	S9010	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	12	156,000	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
GF-2 Tank 6	S692N	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	21	273,000	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
GF-2 Tank 7	S692N	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	21	273,000	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
GF-2 Tank 8	S2501	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	38.5	500,500	6.23	0.29	6.52	3.1E-03	1.5E-04	3.3E-03	3.1E-03	1.5E-04	3.3E-03	Vinyl Acetate
GF-2 Tank 9	DEV-5204E25	Vertical Fixed Roof	Aluminum/Specular	Height: 15', Diameter: 12'	13,000	14.7	191,100	negl.	negl.	negl.	negl.	negl.	negl.	-	-	-	
Total										43.43			0.02			0.02	Vinyl Acetate

"negl." = negligible

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Air Flow Rate (cfm)	Grain Loading (gr/dscf)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 Emissions			Uncontrolled PM/PM10/PM2.5 Emissions		
			lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
90	0.01	99%	0.01	0.19	0.03	0.77	18.51	3.38

The shot blasting unit is used only for maintenance purposes and is operated infrequently.

The particulate matter emissions from the shot blaster, due to its operational limitations, can not exceed the exemption thresholds of less than 5 tons per year of PM/PM10/PM2.5.

Methodology

Controlled Emissions:

PM/PM10/PM2.5 (lb/hr) = Grain Loading (gr/dscf) x Air Flow Rate (cfm) x 1 lb/7,000 gr x 60 min/hr

PM/PM10/PM2.5 (lb/day) = PM/PM10/PM2.5 Emissions (lb/hr) x 24 hr/day

PM/PM10/PM2.5 (ton/yr) = PM/PM10/PM2.5 Emissions (lb/hr) x 8760 hr/yr x 1 ton/2000 lb

Uncontrolled Emissions = Controlled Emissions x 1/(1 - Control Efficiency)

**Appendix A: Emission Calculations
HAPs Summary**

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Operating Permit Number: T 059-35690-00018
Significant Source Mod. No: 059-40465-00018
Significant Permit Mod. No: 059-40479-00018
Reviewer: Bharathi Bhattu

Uncontrolled Potential to Emit (tons/yr)				
Emission Unit	Vinyl Acetate	Formaldehyde	Methanol	Hexane
Coating Operation GF-1	179	2.62	2.25	-
Coating Operation GF-2	212	3.11	2.67	-
Drying Ovens Associated with GF-1	-	0.02	-	0.38
Drying Ovens Associated with GF-2	-	0.02	-	0.56
Boiler B-03	-	0.003	-	0.08
Insignificant Activities: Natural Gas Combustion	-	0.005	-	0.12
Insignificant Activities: Storage Tanks	0.02	-	-	-
Total	391	5.78	4.92	1.13

Limited Potential to Emit (tons/yr)				
Emission Unit	Vinyl Acetate*	Formaldehyde	Methanol	Hexane
Coating Operation GF-1	176	2.62	2.25	-
Coating Operation GF-2	176	3.11	2.67	-
Drying Ovens Associated with GF-1	-	0.02	-	0.38
Drying Ovens Associated with GF-2	-	0.02	-	0.56
Boiler B-03	-	0.003	-	0.08
Insignificant Activities: Natural Gas Combustion	-	0.005	-	0.12
Insignificant Activities: Storage Tanks	0.02	-	-	-
Total	176	5.78	4.92	1.13

* Limiting VOC emissions on GF-1 and GF-2 will proportionately limit HAP emissions.

Note: The shaded cells indicate where limits are included.



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 1, 2018

Mr. Tyler Nestleroad
Avery Dennison
870 West Anderson Boulevard
Greenfield, IN 46140

Re: Public Notice
Avery Dennison
Permit Level: Title V Significant Source
Modification and Significant Permit Modification
Permit Number: 059-40465-00018 and
059-40479-00018

Dear Mr. Nestleroad:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Daily Reporter in Greenfield, Indiana publish the abbreviated version of the public notice no later than November 3, 2018. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Hancock County Public Library, 900 West McKenzie Road in Greenfield, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Bharathi Bhattu, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension (317) 234-8507 or dial (317) 234-8507.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 1, 2018

Daily Reporter
22 West New Road
PO Box 279
Greenfield, IN 46140

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Avery Dennison, Hancock County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than November 3, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 317-233-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 059-40465-00018 and 059-40479-00018

Enclosure
PN Newspaper.dot 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 1, 2018

To: Hancock County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Avery Dennison
Permit Number: 059-40465-00018 and 059-40479-00018

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

November 1, 2018
Avery Dennison
059-40465-00018 and 059-40479-00018

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

November 1, 2018

A 30-day public comment period has been initiated for:

Permit Number: 059-40465-00018 and 059-40479-00018

Applicant Name: Avery Dennison

Location: Greenfield, Hancock County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>


Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	VHAUN 11/1/2018 AVERY DENNISON 059-40465 and 40479-00018 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Tyler Nestleroad Avery Dennison 870 W Anderson Blvd Greenfield IN 46140 (Source RM)										
2		Plant Manager AVERY DENNISON 8080 Norton Pkwy Bldg 22 Mentor OH 44060 (RO RM)										
3		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)										
4		Hancock County Public Library 900 West McKenzie Greenfield IN 46140-1741 (Library)										
5		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)										
6		Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)										
7		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd., #560-W Indianapolis IN 43240 (Consultant)										
8		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)										
9												
10												
11												
12												
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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			