

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Printpack Inc.  
1505 West Main Street  
Greensburg, Indiana 47240

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

This permit is issued 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 and 326 IAC 2-1-3.2 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.: T031-5950-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

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The Permittee owns and operates a stationary printed plastic bag and plastic film production process.

Responsible Official: Randy E. Carter  
Source Address: 1501 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240-0439  
SIC Code: 2673 and 3081  
County Location: Decatur  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD

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

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

- (1) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute.
- (2) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (3) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (4) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute.
- (5) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (6) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute.
- (7) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute.

- (8) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (9) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.
- (10) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (11) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (12) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (13) One (1) automatic parts washer system, W1, exhausting to stack SW1.

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

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements. The insignificant sources at this facility which do not have applicable rules are included in the technical support document for this permit.

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

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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).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense 326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

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

### B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or for
  - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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) This annual compliance certification report required by this permit shall be considered timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 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, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, OAM, 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 Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) 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.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or

- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, 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.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 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 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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, OAM, 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, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the 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.20 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 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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

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

(b) 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in 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, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**

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Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

**B.28 Enhanced New Source Review [326 IAC 2]**

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The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Major Source**

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Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.3 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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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.7 Operation of Equipment [326 IAC 2-7-6(6)]**

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All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

#### **C.10 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements;
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will continue to comply with such applicable requirements that become effective during the term of this permit.

#### **C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within one hundred twenty (120) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM, 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within one hundred twenty (120) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.19 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]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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, OAM, on or before the date it is due.

#### **C.20 Monitoring Data Availability**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time..
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytical techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

**C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (1) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute.
- (2) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (3) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (4) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute.
- (5) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (6) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute.
- (7) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute.

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

#### D.1.1 Emission Limitations and Standards [326 IAC 2-7-5(1)]

There are no emission limitations or standards applicable to these presses, because they were constructed in 1963 and predate the applicability of the rules. Any change or modification of these presses shall require prior approval.

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### **D.1.3 Monitoring**

There are no compliance monitoring requirements applicable to these presses.

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

#### **D.1.4 Record Keeping Requirements**

- (a) To document compliance with 326 IAC 2-6 (Emissions Reporting), the Permittee shall maintain records in accordance with (1) through (2) below.
- (1) The cleanup solvent usage for each month; and
  - (2) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.5 Reporting Requirements**

There are no reporting requirements specifically addressing these presses.

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

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

- (8) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (9) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.

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

#### **D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]**

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses P12 and P13 shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.

#### **D.2.2 Volatile Organic Compound (VOC) Emission Limit**

The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 1760 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

#### **D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

## **Compliance Determination Requirements**

### **D.2.4 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **D.2.5 Control Requirement**

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Pursuant to OP-16-04-87-0048, issued on February 5, 1986, the catalytic oxidizers (OX12 or OX13) for VOC control shall be in operation at all times when the respective presses (P12 or P13) are in operation.

### **D.2.6 Testing Requirements [326 IAC 2-7-6(1)]**

---

Compliance stack tests shall be performed for both of the catalytic incinerators, OX12 or OX13, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on both incinerators within 180 days of the issuance of this permit, and thereafter, both catalytic incinerators shall be tested every two and one half (2 ½) years to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.2.2.

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

### **D.2.7 Parametric Monitoring**

---

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

### **D.2.8 Record Keeping Requirements**

---

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.2.

- (1) The VOC content of the inks used for each month;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.

- (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (10) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

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

##### D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing press P14 shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.

##### D.3.2 Volatile Organic Compound (VOC) Emission Limit

The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 600 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

##### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

#### Compliance Determination Requirements

##### D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

##### D.3.5 Control Requirement

Pursuant to OP-16-04-87-0049, issued on February 5, 1986, the catalytic oxidizer (OX14) for VOC control shall be in operation at all times when the press (P14) is in operation.

#### D.3.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for the catalytic incinerator, OX14, used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed by the end of the year 1998, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.3.2.

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

#### D.3.7 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

#### D.3.8 Record Keeping Requirements

To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.3.2.

- (1) The volume weighted VOC content of the coatings used for each month;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
  - (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (11) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

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

#### D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses [P12, P13, P14, P15, P16] shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.

#### D.4.2 Volatile Organic Compound (VOC) Emission Limit

The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 390 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

#### D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.4.5 Control Requirement

Pursuant to CP 031-2102 ID 031-00001, issued on July 31, 1991, the catalytic oxidizer (OX15) for VOC control shall be in operation at all times when the press (P15) is in operation.

#### D.4.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for the catalytic incinerator, OX15, used to achieve compliance with 8-5-5. This stack test shall be performed by the end of the year 1999, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.4.2.

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

### **D.4.7 Parametric Monitoring**

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

### **D.4.8 Record Keeping Requirements**

To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.4.2:

- (1) The volume weighted VOC content of the coatings used for each month;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
  - (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.4.9 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.5 FACILITY OPERATION CONDITIONS**

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

- (12) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

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

### **D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]**

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses [P12, P13, P14, P15, P16] shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.

**D.5.2 Volatile Organic Compound (VOC) Emission Limit**

---

The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 390 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

**D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

**D.5.4 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.5.5 Control Requirement**

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Pursuant to CP 031-3576, ID 031-00001, issued on September 12, 1994, the catalytic oxidizer (OX16) for VOC control shall be in operation at all times when the press (P16) is in operation.

**D.5.6 Testing Requirements [326 IAC 2-7-6(1)]**

---

Compliance stack tests shall be performed for the catalytic incinerator, OX16, used to achieve compliance with 8-5-5. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in D.5.2.

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

**D.5.7 Parametric Monitoring**

---

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

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

**D.5.8 Record Keeping Requirements**

---

To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.5.2;

- (1) The volume weighted VOC content of the coatings used for each month;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month; and

- (4) The weight of VOCs emitted for each compliance period.
  - (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.5.9 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported

### **SECTION D.6 FACILITY OPERATION CONDITIONS**

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

(13) One (1) automatic parts washer system, identified as W1, using no control, and exhausting to stack SW1.

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

##### **D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

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

##### **D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

#### **Compliance Determination Requirements**

##### **D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

### **D.6.4 Monitoring**

There is no monitoring required of this degreaser.

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

### **D.6.5 Record Keeping Requirements**

To document compliance with Conditions D.6.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions

- (1) The degreaser solvent usage for each month;
  - (2) Records of any disposal of degreaser solvent as waste;
  - (3) The % VOC content of the solvent for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping requirements, of this permit.

### **D.6.6 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported

## **SECTION D.7 FACILITY OPERATION CONDITIONS**

### **Insignificant Activity**

[Facility Description [326 IAC 2-7-5(15)]  
One (1) natural gas/propane fired boiler, with a rated capacity of 2.25 million British thermal units per hour (MM Btu/hr),

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

### **D.7.1 Particulate Matter (PM) [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3, the allowable PM emission rate from the natural gas boiler shall not exceed 15.95 pounds per MM Btu heat input.

## **Compliance Determination Requirements**

### **D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001

**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:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001

**This form consists of 2 pages**

**Page 1 of 2**

1. 9	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
2. 9	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:
Date/Time Emergency/Deviation started:

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly (or semi-annually). Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### Part 70 Monthly Report

Source Name: Printpack Inc.  
 Source Address: 1505 West Main Street, Greensburg, IN 47240  
 Mailing Address: P.O. Box 439, Greensburg, IN 47240  
 Part 70 Permit No.: T031-5950-00001  
 Facility: Catalytic Oxidizer \_\_\_\_\_  
 Parameter: Temperature  
 Limit: Determined by most recently performed acceptable stack test \_\_\_\_\_  
 Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001  
Facility: Flexographic Presses P1-P6 and P9  
Parameter: VOC emissions  
Limit: none

YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001  
Facility: Flexographic Presses P12 and P13  
Parameter: VOC input  
Limit: 1760 ton/yr

Overall Control Efficiency as determined by last compliant stack test: \_\_\_\_\_  
YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001  
Facility: Flexographic Press P14  
Parameter: VOC input  
Limit: 600 ton/yr

Overall Control Efficiency as determined by last compliant stack test: \_\_\_\_\_  
YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001  
Facility: Flexographic Press P15  
Parameter: VOC input  
Limit: 390 ton/yr

Overall Control Efficiency as determined by last compliant stack test: \_\_\_\_\_  
YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Printpack Inc.  
Source Address: 1505 West Main Street, Greensburg, IN 47240  
Mailing Address: P.O. Box 439, Greensburg, IN 47240  
Part 70 Permit No.: T031-5950-00001  
Facility: Flexographic Press P16  
Parameter: VOC input  
Limit: 390 ton/yr

Overall Control Efficiency as determined by last compliant stack test: \_\_\_\_\_  
YEAR: \_\_\_\_\_

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

9 No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** Printpack Inc.  
**Source Location:** 1505 West Main Street, Greensburg, IN 47240  
**County:** Decatur  
**SIC Code:** 2673 and 3081  
**Operation Permit No.:** T031-5950-00001  
**Permit Reviewer:** Holly M. Stockrahm

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Printpack Inc. relating to the operation of printed plastic bag and plastic film production process.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) flexographic printing press, identified as P1, using no control, and exhausting to stack SP1. The maximum printing width is 44.5 inches and the maximum output is 1000 feet per minute.
- (2) One (1) flexographic printing press, identified as P2, using no control, and exhausting to stack SP2. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (3) One (1) flexographic printing press, identified as P3, using no control, and exhausting to stack SP3. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (4) One (1) flexographic printing press, identified as P4, using no control, and exhausting to stack SP4. The maximum printing width is 62 inches and the maximum output is 1000 feet per minute.
- (5) One (1) flexographic printing press, identified as P5, using no control, and exhausting to stack SP5. The maximum printing width is 45.5 inches and the maximum output is 1000 feet per minute.
- (6) One (1) flexographic printing press, identified as P6, using no control, and exhausting to stack SP6. The maximum printing width is 48.5 inches and the maximum output is 1000 feet per minute.
- (7) One (1) flexographic printing press, identified as P9, using no control, and exhausting to stack SP9. The maximum printing width is 46 inches and the maximum output is 1300 feet per minute.

- (8) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (9) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.
- (10) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (11) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (12) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

### **Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

The source also consists of the following unpermitted facility:

- (1) One (1) automatic parts washer system, W1, exhausting to stack SW1.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, (catalytic incinerators, OX12 - OX16, drying oven on P16, boiler).
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.

- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (8) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; or 0.3 psi measured at 38 °C (100°F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; or 0.1 psi measured at 20 °C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (9) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (10) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (11) Heat exchanger cleaning and repair.
- (12) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (15) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (16) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (17) Diesel generators not exceeding 1600 horsepower.
- (18) Stationary fire pumps.
- (19) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°C).
- (20) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (21) Other activities or categories not previously identified, below insignificant thresholds:
  - (a) Solvent recycling (distillation) unit with batch capacity of 106 gallons. VOC emissions estimated at 5.7 lb/day (using AP42).

- (b) Six (6) 10,000 gallon organic solvent storage tanks. VOC emissions estimated below 1 lb/day (using Tanks 2.0 software calculations).
- (c) Eight (8) blown film extrusion lines. Emissions per line (unit) estimated as: Particulate below 1 lb/day; VOC below 1 lb/day; HAPs at 0.01 lb/day. Emissions using industry developed emission factors.
- (d) Fifty-six (56) bag machines (cutting polypropylene into bags). Emissions per bag machine (unit) estimated as: Particulate at 0.01 lb/day; VOC at 0.01 lb/day; HAPs at 0.001 lb/day. Emissions based on interpolation from available industry data.
- (e) Eleven (11) polyethylene resin pellet silos. Particulate emissions per silo estimated at 50 lb/year. Emissions rate of 9.33 pounds of particulate per million pounds of polyethylene handled is based on sampling data.
- (f) Eleven (11) corona treater units (applies a corona discharge to plastic film to improve surface properties. Treater units generate ozone at a rate of 0.073 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for each treater:

<u>Unit ID</u>	<u>Kilowatt/hr</u>	<u>Ozone generation rate</u>
Line 21	5kW	1.6 ton/yr
Line 22	2.5kW	0.8 ton/yr
Line 23	7kW	2.24 ton/yr
Line 24	7kW	2.24 ton/yr
Line 25	6kW	1.92 ton/yr
Line 26	15kW	4.8 ton/yr
Line 26	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 28	2.5kW	0.8 ton/yr
Slitter#5	3.5kW	1.12 ton/yr

- (g) Vulcanized plate making processes,
- (h) Rubber roll grinding,
- (i) Yard care activities,
- (j) General Office Activities (copying, cleaning, etc.),
- (k) Yard care activities, and
- (l) Maintenance shop activities such as welding and grinding and buffing.

### Existing Approvals

The source has been operating under the following approvals:

- (1) OP 16-04-87-0037, issued on April 29, 1983.
- (2) OP 16-04-87-0038, issued on April 29, 1983.
- (3) OP 16-04-87-0039, issued on April 29, 1983.
- (4) OP 16-04-87-0040, issued on April 29, 1983.
- (5) OP 16-04-87-0041, issued on April 29, 1983.
- (6) OP 16-04-87-0048, issued on February 5, 1986.
- (7) PC (16) 1553, issued on July 2, 1984.
- (8) OP 16-04-87-0049, issued on February 5, 1986.
- (9) PC (16) 1560, issued on April 10, 1985.
- (10) CP 031-2102, ID 031-00001, issued July 31, 1991.
- (11) CP 031-3576, ID 031-00001, issued September 12, 1994.

#### **Enforcement Issue**

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
  - (1) One (1) automatic parts washer system, identified as W1, exhausting to stack SW1.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on May 29, 1996, and additional information was received on October 22, 1996.

A notice of completeness letter was mailed to the source on February 10, 1997.

#### **Emission Calculations**

Potential VOC emissions from the parts washer, W1, are based on the usage rate of reclaimed solvent (MSDS specifies reclaimed solvent composition as 18-22% n-propyl acetate and 78-82% normal propanol):

$$\text{VOC} = 12 \text{ gal/day} * 6.86 \text{ lb/gal} * 100\% \text{ VOC} = 82.32 \text{ lb/day} * 365 \text{ day/yr} * \text{ton}/2000 \text{ lb} = 15 \text{ ton/yr.}$$

**Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
glycol ethers	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM-10	0.549
SO <sub>2</sub>	0.027
VOC	855.140
CO	0.961
HAP (glycol ethers)	1.740
NO <sub>x</sub>	4.574

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
P1-P6, P9				none			
P12 and P13				176			
P14				60			
P15				39			
P16				39			
Total Emissions				314			

P1-P6, and P9 have no emission limits.

P12 and P13 VOC emission limit is specified under OP16-04-87-0048, issued on February 5, 1986.

P14 VOC emission limit is specified under OP16-04-87-0049, issued on February 5, 1986.

P15 VOC emission limit is specified under CP031-2102, ID031-00001, issued on July 31, 1991.

P16 VOC emission limit specified under CP031-3576, ID031-00001, issued on September 12, 1994.

### County Attainment Status

The source is located in Decatur County.

Pollutant	Status
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Decatur County has been designated as attainment or unclassifiable for ozone.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source. The NSPS Subpart QQ is a standard for rotogravure printing, not flexographic.
- (b) Under enhanced new source review, there is no NSPS applicable to the cold cleaner degreaser.
- (c) Under enhanced new source review, the Degreaser NESHAP does not apply to this cold cleaner degreaser because chlorinated solvents are not used. No other NESHAPs applies to this source.

### **State Rule Applicability - Entire Source**

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a major PSD source, although printing presses P1-P6, and P9 predate any PSD and Rule 8 requirements, (these units were constructed prior to March of 1988). Presses 12, 13, 14, 15, and 16 have VOC limits to keep them under PSD review level. P12 and P13 VOC limit is specified under OP16-04-87-0048, issued on February 5, 1986. P14 VOC limit is specified under OP16-04-87-0049, issued on February 5, 1986. P15 VOC limit is specified under CP031-2102, ID031-00001, issued on July 31, 1991. P16 VOC limit is specified under CP031-3576, ID031-00001, issued on September 12, 1994.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 2-1-3.4 (Air Toxics)

326 IAC 2-1-3.4 (Air Toxics) does not apply to the degreaser as it was constructed in 1980 and emits less than 10 tons per year.

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

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

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), presses P12 through P16 comply with this rule by using a carbon adsorption/incinerator/alternative VOC reduction system with 90% efficiency. P1-P6, and P9 were constructed prior to the applicability of this rule. P12 and P13 catalytic incineration is specified under OP16-04-87-0048, issued on February 5, 1986. P14 catalytic incineration is specified under OP16-04-87-0049, issued on February 5, 1986. P15 catalytic incineration is specified under CP031-2102, ID031-00001, issued on July 31, 1991. P16 catalytic incineration specified under CP031-3576, ID031-00001, issued on September 12, 1994. Compliance with this rule may be determined pursuant to 326 IAC 8-1-4.

### 326 IAC 8-3-5

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

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

### 326 IAC 8-6

This source is not subject to 326 IAC 8-6, because the source existed prior to 1974.

## **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The presses P12 and P13 have applicable compliance monitoring conditions as specified below:

- (a) Continuous monitoring systems shall be calibrated, maintained, and operated on the catalytic oxidizers for measuring operating temperature. The output of these systems shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.

The press P14 has applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.

The press P15 has applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.

The press P16 has applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliant stack test.

These monitoring conditions are necessary because the use of catalytic oxidizers as controls satisfies the requirements of 326 IAC 8-5-5 (Graphic Arts Operations), and limits VOC emissions so that the requirements of 326 IAC 2-3 (Prevention of Significant Deterioration) do not apply.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

### **Conclusion**

The operation of this printed plastic bag and plastic film production process shall be subject to the conditions of the attached proposed **Part 70 Permit No. T031-5950-00001**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Title V Permit

Source Name: Printpack, Inc.  
Source Location: 1505 West Main Street, Greensburg, IN 47240  
County: Decatur  
Title V Permit No.: T-031-5950-00001  
SIC Code: 3714  
Permit Reviewer: Holly M. Stockrahm

On November 6, 1997, the Office of Air Management (OAM) had a notice published in The Greensburg Daily News, Greensburg, Indiana, stating that Printpack, Inc. had applied for a Title V permit to operate a printed plastic bag and plastic film production plant with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 15, 1997, Printpack, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows (changes are bolded for emphasis):

**1. Comment 1:**

On page 6 of 50, Section A.1, of the proposed permit, the Responsible Official is now Randy E. Carter, Mr. Leitgabel no longer works for Printpack, Inc.

**Response to Comment 1:**

Identification of the Responsible Official on page 6 of 49, Section A.1, of the proposed permit has been changed from:

Responsible Official: Robert E. Leitgabel

to be as follows:

Responsible Official: **Randy E. Carter**

**2. Comment 2:**

On page 7 of 50 of the proposed permit, Section A.2, the description of the parts washer should read "One (1) automatic parts washer system, W1, exhausting to stack SW1."

**Response to Comment 2:**

The description of the parts washer on page 7 of 50 of the proposed permit, Section A.2, and in the Technical Support Document (TSD) has been changed from:  
(13) One (1) parts washer, W1, exhausting to stack SW1.

to be as follows:

(13) One (1) **automatic** parts washer **system**, W1, exhausting to stack SW1.

There are no changes in the conditions specified for this unit due to this revision.

**3. Comment 3:**

Printpack requests that Section A.2 of the proposed permit contain a cross reference to the insignificant source list in the TSD. The recommended wording is "The list of unregulated insignificant sources at this facility is found in the technical support document for this permit."

**Response to Comment 3:**

Insignificant activities listed in Section A.3 of the permit are only those that are specifically regulated by state or federal rules. The TSD has a complete list of insignificant activities at the source. Those that were listed in the TSD and not in the permit, do not have specific rules that apply to them. Therefore, the comment, "The insignificant sources at this facility which do not have applicable rules are included in the technical support document for this permit, " shall be added.

**4. Comment 4:**

On page 10 of 50 of the proposed permit, Condition B.12 (a)(1), the Preventive Maintenance Plan (PMP), requires the specification of individuals performing maintenance functions would be too restrictive and would cause the preventive maintenance plan to be in a constant state of update. Using job titles would be more appropriate.

**Response to Comment 4:**

OAM concurs, Condition B.12 (a)(1) of the proposed permit has been changed from:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

to be as follows:

(1) Identification of the individuals or the **job title(s) of the person** responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

**5. Comment 5:**

On page 21 of 50 of the proposed permit, Condition C.14 (a), Asbestos Abatement Projects, the wording appears to overreach. If a building change does not involve asbestos, notification is not appropriate. Please clarify this notification requirement.

**Response to Comment 5:**

This language exactly reflects the language of the federal rule 40 CFR 61.140, and the requirements are as stated in the condition. Not only is notification required in any demolition, but ten working days must lapse from the time of notification before work can proceed. IDEM may perform its own inspection during that time. This comment does not effect any changes to the final permit.

**6. Comment 6:**

On page 22 of 50 of the proposed permit, Condition C.15 requiring that Printpack submit an Emergency Reduction Plan should be deleted because we are not located in a non-attainment area. If we are required to submit a plan, we request that the submittal date under (b) be extended from 90 days to 120 days after permit issuance due to the number of facilities Printpack has in the United States.

**Response to Comment 6:**

Pursuant to 326 IAC 1-5-2, all persons responsible for the operation of a source that has the potential to emit of one hundred (100) tons per year, or more, of any pollutant shall prepare and submit written Emergency Response Plans. The request for an extension is granted. Condition C.15(b) of the proposed permit has been changed from:

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

to be as follows:

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within **one hundred twenty (120)** days after the date of issuance of this permit.

**7. Comment 7:**

On page 23 of 50 of the proposed permit, Condition C.17(a)(5) states that the Compliance Monitoring Plan must be submitted within 90 days, Printpack requests that the submittal date be extended from 90 days to 120 days after permit approval due to the number of plants Printpack has in the United States.

**Response to Comment 7:**

The extension of the submittal date for the Compliance Monitoring Plans has been granted. Condition C.17 (a)(5) of the proposed permit has been changed from:

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

to be as follows:

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within **one hundred twenty (120)** days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

**8. Comment 8:**

On page 28 of 50, Condition D.1.2 of the proposed permit, a Preventive Maintenance Plan (PMP) is required for presses with no control device. Printpack believes it is beyond the purview of an air emission permit to specify any preventive maintenance plan for a press, so this condition should be deleted.

**Response to Comment 8:**

In this instance, OAM agrees to delete Condition D.1.2.

**9. Comment 9:**

On page 30 of 50 of the proposed permit, Condition D.2.3 requires a PMP for the facility and its control device. Again, Printpack believes it is beyond the purview of an air emission permit to specify any PMP for a press, so this condition should be changed to include only the control device.

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

1. Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
2. Implement the preventive maintenance plan; and
3. Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (d) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (e) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (f) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

This comment effects no change to the final permit.

**Response to Comment 9:**

The press as well as control should be properly maintained to minimize emissions. This comment effects no change to the final permit.

**10. Comment 10:**

On page 32 of 50 of the proposed permit, Condition D.3.3, the comment is the same as Comment 9.

**Response to Comment 10:**

See Response to Comment 9. This comment effects no change to the final permit.

**11. Comment 11:**

Printpack requests that testing for oxidizer 14 be timed to coincide with that for oxidizers 12, 13, and 15. Economics of scale should allow Printpack to negotiate a better price for a week long test program every other year instead of one or two oxidizers each year.

**Response to Comment 11:**

Upon further review, OAM has changed the required frequency for stack testing to every two and one half (2 ½) years. Conditions D.2.6 requiring stack testing of 2 separate oxidizers to determine compliance with one limit needs to contain a more exact schedule for testing so that both oxidizers can be monitored for continuous compliance. In addition, the 90 % efficiency specified in the permit needs to state overall efficiency. Condition D.2.6 has been changed from:

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D.2.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for one of the catalytic incinerators, OX12 or OX13, used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed within 180 days of the issuance of this permit, and thereafter at least once every two (2) years, to determine the minimum operating temperature that will achieve at least a 90% efficiency for this incinerator and the emission limit specified in Condition D.2.2.

to be as follows:

---

D.2.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for **both** of the catalytic incinerators, OX12 or OX13, used to achieve compliance with 326 IAC 8-5-5. The **initial** stack tests shall be performed on **both incinerators** within 180 days of the issuance of this permit, and thereafter, **both catalytic incinerators shall be tested every two and one half (2 ½) years** to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.2.2.

Conditions D.3.6, D.4.6, and D.5.6 are identical conditions specifying testing requirements for the catalytic incinerators, and need to specify a 90% overall efficiency. The word overall has been added to all of these conditions, and the span between testing has been changed to 2 and one half (2 ½) years. Condition D.3.6, D.4.6 and D.5.6 has changed from:

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D.3.6 , D.4.6, and D.5.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for the catalytic incinerator, OX14, OX15 or OX16, used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed by the end of the year 1998, and thereafter at least once every two (2) years, to determine the minimum operating temperature that will achieve at least a 90% efficiency for this incinerator and the emission limit specified in Condition D.3.2, D.4.2, or D.5.2.

to be as follows:

---

D.3.6 , D.4.6, and D.5.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for the catalytic incinerator, OX14, OX15 or OX16, used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed by the end of the year 1998, and thereafter at least once every **two and one half (2 ½) years**, to determine the minimum operating temperature that will achieve at least a 90% **overall** efficiency for this incinerator and the emission limit specified in Condition D.3.2, D.4.2, or D.5.2.

**12. Comment 12:**

On page 34 of 50, Condition D.4.3, the comment is the same as Comment 9.

**Response to Comment 12:**

See Response to Comment 9. This comment effects no change to the final permit.

**13. Comment 13:**

On page 34 of 50 of the proposed permit, Condition D.4.6, the comment requests that all oxidizers be stack tested on the same schedule.

**Response to Comment 13:**

See Response to Comment 11.

**14. Comment 14:**

On page 36 of 50, Condition D.5.3, the comment concerning the PMP is the same as Comment 9.

**Response to Comment 14:**

See Response to Comment 9. This comment effects no change to the final permit.

**15. Comment 15:**

On page 2 of 10 of the TSD, under Insignificant Activities (1), please include boilers in the list of natural gas fired combustion sources with heat input less than 10 MM Btu/hr.

**Response to Comment 15:**

One (1) natural gas/propane fired boiler with a capacity of 2.25 MM Btu/hr has been added to the list of insignificant activities in the TSD and as Section D.7 of the final permit. The boiler was constructed in 1973 and must comply with the allowable limit under 326 IAC 6-2-3, calculations are as follows:

$Pt = C \cdot a \cdot h / 76.5 \cdot Q^{0.75} \cdot N^{0.25}$  where Pt = lb PM/MM Btu/hr, C = 50, Q = total source operating capacity, N = number of stacks, a = 0.8, h = stack height

$Pt = 50 \cdot 0.8 \cdot 25 / 76.5 \cdot 2.25^{0.75} \cdot 1^{0.25}$

Pt = 7.09 lb PM/MM Btu

2.25 MM Btu/hr \* 7.09 lb PM/MM Btu = 15.95 lb PM/hr

The boiler complies with this limit.

**16. Comment 16:**

On page 4 of 10 of the TSD, the list of insignificant activities must be expanded to include (g) Vulcanized plate making processes, (h) Rubber roll grinding, (i) Yard care activities, (j) General Office Activities (copying, cleaning, etc.), (k) Yard care activities, and (l) Maintenance shop activities such as welding and grinding and buffing.

**Response to Comment 16:**

Section Insignificant Activities (21) Other activities or categories not previously identified, on page 4 of 10 of the TSD has been expanded to include:

- (g) Vulcanized plate making processes,
- (h) Rubber roll grinding,
- (i) Yard care activities,
- (j) General Office Activities (copying, cleaning, etc.),
- (k) Building Maintenance activities, and
- (l) Maintenance shop activities such as welding and grinding and buffing.

**17. Comment 17:**

On page 4 of 10 of the TSD, Section Insignificant Activities (21)(f), the corona treater listed for slitler #6 should be listed for slitler #5.

**Response to Comment 17:**

The Section Insignificant Activities (21)(f) of the TSD has been changed from:

- (f) Eleven (11) corona treater units (applies a corona discharge to plastic film to improve surface properties. Treater units generate ozone at a rate of 0.073 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for each treater:

<u>Unit ID</u>	<u>Kilowatt/hr</u>	<u>Ozone generation rate</u>
Line 21	5kW	1.6 ton/yr
Line 22	2.5kW	0.8 ton/yr
Line 23	7kW	2.24 ton/yr
Line 24	7kW	2.24 ton/yr
Line 25	6kW	1.92 ton/yr
Line 26	15kW	4.8 ton/yr
Line 26	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 28	2.5kW	0.8 ton/yr
Slitler#6	3.5kW	1.12 ton/yr

to be as follows:

- (f) Eleven (11) corona treater units (applies a corona discharge to plastic film to improve surface properties. Treater units generate ozone at a rate of 0.073 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for each treater:

<u>Unit ID</u>	<u>Kilowatt/hr</u>	<u>Ozone generation rate</u>
Line 21	5kW	1.6 ton/yr
Line 22	2.5kW	0.8 ton/yr
Line 23	7kW	2.24 ton/yr
Line 24	7kW	2.24 ton/yr
Line 25	6kW	1.92 ton/yr
Line 26	15kW	4.8 ton/yr
Line 26	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 27	15kW	4.8 ton/yr
Line 28	2.5kW	0.8 ton/yr
Slitler#5	3.5kW	1.12 ton/yr

**18. Comments by OAM:**

Upon further review of Conditions D.1.5 and D.1.6 have found that they contradict each other, one requiring record keeping and the other stating that no record keeping is required, so Condition D.1.6 has been changed from:

D.1.6 Reporting Requirements

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There are no **record keeping and** reporting requirements specifically addressing these presses.

to be as follows:

#### D.1.6 Reporting Requirements

---

There are no reporting requirements specifically addressing these presses.

### Model Permit Language Revisions

#### Section A

19. A (Source Summary) has been changed as follows:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application. **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.**

20. A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

#### Section B

21. B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

#### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

---

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

22. B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

#### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

---

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential,~~ the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

23. Conditon B.11 (a) and (c) (Annual Compliance Certification) has been has been changed as follows:

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

24. B.12 (a)(Preventive Maintenance Plan) has been changed as follows:

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

25. B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

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**(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

~~(a)~~ **(b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

(2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

~~(b)~~ **(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, 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)~~ **(d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, 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. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e) 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.
  - (f) 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).
  - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
  - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
26. B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
  - (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
  - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
  - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
  - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**
- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (e) **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

27. B.18 (Permit Renewal) part (a) of the condition has been changed as follows:

**B.18 Permit Renewal [326 IAC 2-7-4]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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(20)**(21) and 326 IAC 2-7-1(40).**

28. B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification) shown below. B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition will read as follows:

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

---

- (a) **The Permittee must comply with 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

29. In the first paragraph of Conditon B.26 (now B.24) (Inspection and Entry), "IDEM" has been deleted, since Local Agencies do not have IDEM identification cards.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

30. B.27 (now B.25) (Transfer of Ownership or Operation) part (b) of the condition has been changed as follows:

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

---

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

31. B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

32. B.27 (Credible Evidence) is a new condition that should be added to the end of section B, it will read as follows:

**B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**  
**Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.**

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### Section C

33. C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour): this is a new condition from the Guidance for Current Permit and Compliance Issues (3-19-1998). Renumber the remainder of Section C accordingly.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

---

**Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.**

34. Under C.2 (Opacity)(now C.3) the statement, "This condition is not federally enforceable.", has been deleted.

35. C.3 (Open Burning)(now C.4) has been has been changed as follows:

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

---

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

36. Under C.4 (Incineration)(now C.5), the statement: "This condition is not federally enforceable.", has been deleted.

37. C.5 (Fugitive Dust Emissions)(now C.6) has been modified as follows:

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

---

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

38. C.6 (now C.7) (Operation of Equipment) has been changed as follows:

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

---

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

39. C.7 (now C.8) (Stack Height) has been changed as follows:

**C.8 Stack Height [326 IAC 1-7]**

---

(a) The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

~~(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

1. C.8 (now C.9) (Asbestos Abatement Projects- Accreditation) and C.16 (Asbestos Abatement Projects) have been combined into one condition which will read as follows:

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

---

(a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**

(b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

(1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**

(2) **If there is a change in the following:**

(A) **Asbestos removal or demolition start date;**

(B) **Removal or demolition contractor; or**

(C) **Waste disposal site.**

- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

**All required notifications shall be submitted to:**

**Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (e) **Procedures for Asbestos Emission Control**  
**The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.**

2. C.9 (now C.10) (Performance Testing) change the rule cite to 326 IAC 3-6 and add the following language:

**C.10 Performance Testing** ~~326 IAC 3-2-1~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

3. C.10 (now C.11) (Compliance Schedule) has been changed as follows:

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**C.11** Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements;
  - (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
  - (c) Will **continue to** comply with such **applicable** requirements that become effective during the term of this permit.
4. C.11 (now C.12) (Compliance Monitoring) has been changed as follows:

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**C.12** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date, and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

5. C.13 (now C.14) (Monitoring Methods) has been changed as follows:

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**C.14** Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

6. C.14 (Asbestos Abatement Projects) has been deleted. It is now C.9 (Asbestos Abatement Projects) and has been revised there.

7. C.15 (Emergency Reduction Plans) has been changed as follows:

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**C.15** 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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within one hundred twenty (120) days after the date of issuance of this permit.

**The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
  - (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
  - (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
  - (f) Upon direct notification by IDEM, OAM, 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]
8. C.16 (Risk Management Plan) has been changed as follows:

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

**All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

9. C.17 (Compliance Monitoring Plan - Failure to Take Corrective Action) change the title and add the following rule cites:

C.17 Compliance Monitoring Plan - Failure to Take ~~Corrective Action~~ **Response Steps** [326 IAC 2-7-5(3)] **[326 IAC 2-7-6] [326 IAC 1-6]**

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10. C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test), add the following rule cites to the title, and add language as follows:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

**The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

11. C.19 (Emission Statement ) part (a) of the condition has been changed as follows:

C.19 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]**

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- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

12. C.21 (General Record Keeping Requirements) part (a) has been changed as follows:

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]**[326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application.

These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** within one (1) hour upon verbal request of an IDEM, OAM, representative, ~~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** providing they are made available within thirty (30) days after written request. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

13. C.22 (General Reporting Requirements) part (a) and (b) has been revised and the rest of the condition has been re-lettered as follows:

~~C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]~~

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

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- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- (b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
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- ~~(b)~~ (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, OAM, on or before the date it is due.

- ~~(c)~~ (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- ~~(d)~~ (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

~~(e)~~ (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~ (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

**The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

## Section D

14. D (Facility Operation Conditions) add the following language, **[Facility Description [326 IAC 2-7-5(15)]**, to the facility description box in all D sections.

15. D.1.3, D.6.3, D.7.2 (Testing Requirements) has been changed as follows:

~~D.1.3, D.6.3, D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

16. D.2.1, D.3.1, D.4.1, and D.5.1 has been changed as follows:

~~D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]~~

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses [P12, P13, P14, P15, P16] shall utilize an~~

~~(a) the volatile fraction of the ink, as applied to the substrate, contains 25% by volume or less of organic solvent and 75% by volume or more of water, or~~

~~(b) the ink, as applied to the substrate, less water contains 60% by volume or more nonvolatile material, or~~

~~(c) a carbon adsorption/incinerator/ alternative VOC reduction system that achieves at least 90% overall destruction efficiency; or~~

~~(d) the ink is limited to 0.5 pound of VOC per pound of solids.~~

17. D.2.2, D.3.2, D.4.2, D.5.2 has been changed as follows:

~~D.2.2 Volatile Organic Compound (VOC) Emission Limit~~

~~The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC emissions input shall not exceed [1760, 600, 390, 390] tons per year. after control.~~

Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

The reporting forms have been changed.

18. D.2.4, D.3.4, D.4.4, and D.5.4 (Volatile Organic Compounds) has the following rule cites changed.

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

19. Forms
- (a) On the Certification Form "Emergency/Deviation Occurrence Reporting Form" has been deleted.
  - (b) On the Quarterly Compliance Report has been added.
  - (c) On the Emergency/ Deviation Occurrence Reporting Form, "Attach a signed certification to complete this report" from the bottom of the second page has been deleted.
20. The Table of Contents has been renumbered to reflect the changes above.