

PART 70 OPERATING PERMIT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

Bemis Company Inc.
1350 North Fruitridge Ave.
Terre Haute, Indiana 47805

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T167-6182-00033	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004 Expiration Date: June 28, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). 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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polyethylene film plant including film production, printing, and converting operations.

Responsible Official:	Plant Manager
Source Address:	1350 North Fruitridge Ave., Terre Haute, Indiana 47805
Mailing Address:	PO Box 905, Terre Haute, Indiana 47808
General Source Phone Number:	(812) 466-2213
SIC Code:	2673, 3081, and 3079
County Location:	Vigo County
Source Location Status:	Maintenance Attainment for Sulfur Dioxide (SO ₂) Attainment for all other criteria pollutants Nonattainment for ozone under the 8-hour standard
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, under Nonattainment NSR Not 1 of 28 Source Categories

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

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

- (1) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (9) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.

- (10) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (11) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (12) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (13) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (14) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (15) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (16) Flexographic printing press, identified as press #19, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (17) Flexographic printing press, identified as press #20, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (18) Flexographic printing press, identified as press #21, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (19) Flexographic printing press, identified as press #22, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (20) Flexographic printing press, identified as press #23, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (21) Flexographic printing press, identified as press #24, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (22) Flexographic printing press, identified as press #25, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (23) Flexographic printing press, identified as press #27, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (24) Flexographic printing press, identified as press #28, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (25) Flexographic printing press, identified as press #29, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (26) Flexographic printing press, identified as press #30, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (27) Flexographic printing press, identified as Press 31, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (28) Flexographic printing press, identified as Press 32, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (29) Flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to

- stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (30) Flexographic printing press, identified as Press 34, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
 - (31) Flexographic printing press, identified as Press 35, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
 - (32) Flexographic in-line printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
 - (33) Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
 - (34) Closed Solvent Spray type parts washer exhausting to stack 20.
 - (35) Cyrel plate making facility exhausting to stack 23.
 - (36) Catalytic Oxidizer, identified as I1, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 1.
 - (37) Catalytic Oxidizer, identified as I2, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 2.
 - (38) Catalytic Oxidizer, identified as I3, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 3.
 - (39) Catalytic Oxidizer, identified as I4, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 4.
 - (40) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 5.
 - (41) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 6.
 - (42) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 7.
 - (43) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 8.
 - (44) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 9.
 - (45) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 10.

- (46) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 11.
- (47) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 12.
- (48) Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (49) Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (50) Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (51) Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (52) Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (53) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (54) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (55) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (56) Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (57) Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (58) Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (59) Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.
- (60) Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (61) Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (62) Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (63) Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (64) Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (65) Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.

- (66) Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (67) Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

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

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

- (1) 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. [326 IAC 6-1-2]
- (2) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (3) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (4) "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM source. [326 IAC 6-1-2]
- (5) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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

B.4 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.5 Severability [326 IAC 2-7-5(5)]

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ and VCAPC, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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 is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

- (c) 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.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year, with submittal of the certification due by July 1 of the following year. Certifications for all subsequent years shall cover the time period from January 1 to December 31, with submittal of the certification due by July 1 of the following year to:

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC, 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.11 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 (PMPs) 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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

IDEM

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

VCAPC

Telephone Number: 812-462-3433
Facsimile Number: 812-462-3447

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

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and VCAPC, 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, OAQ and VCAPC, telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ or VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean

Air Act.

- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ or VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ or VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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)] The notification by the Permittee does require the certification by the

“responsible official” as defined by 326 IAC 2-7-1(34).

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

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (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, OAQ and VCAPC, on or before the date it is due.
 - (2) If IDEM, OAQ and VCAPC, 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, OAQ and VCAPC, take 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, OAQ and VCAPC, 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, OAQ and VCAPC, fail 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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, for public review.

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require 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, OAQ, VCAPC, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5][IC 13-17-3-2]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, VCAPC, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC, within thirty (30) calendar days of

receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ or VCAPC, the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

C.2 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.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

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

All required notifications shall be submitted to:

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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 applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC.

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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the Permittee submits to IDEM, OAQ and VCAPC, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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).

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of any other operating parameter, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

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

- (c) If the ERP is disapproved by IDEM, OAQ and VCAPC, 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, OAQ and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are 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.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline.
- (c) IDEM, OAQ and VCAPC reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (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 estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (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, OAQ and VCAPC, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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) Flexographic printing press, identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press, identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press, identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press, identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press, identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press, identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press, identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Cyrel plate making facility exhausting to stack 23.
- (9) Storage tank for reclaim solvent blend, identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (10) Storage tank for slow solvent blend, identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (11) Storage tank for fast solvent blend, identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (12) Storage tank for hazardous waste storage of ink, identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (13) Storage tank for reclaim solvent blend, identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (14) Storage tank for slow solvent blend, identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (15) Storage tank for fast solvent blend, identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (16) Storage tank for hazardous waste storage of ink, identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

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

There are no specific applicable requirements for these emission units.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (1) Flexographic printing press, identified as press #11, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (2) Flexographic printing press, identified as press #12, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (3) Flexographic printing press, identified as press #13, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (4) Flexographic printing press, identified as press #14, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (5) Flexographic printing press, identified as press #15, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (6) Flexographic printing press, identified as press #16, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (7) Flexographic printing press, identified as press #17, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (8) Flexographic printing press, identified as press #18, using catalytic oxidation for control, and exhausting to stacks 1, 2, 3, and/or 4.
- (9) Catalytic Oxidizer, identified as I1, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 1.
- (10) Catalytic Oxidizer, identified as I2, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 2.
- (11) Catalytic Oxidizer, identified as I3, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 3.
- (12) Catalytic Oxidizer, identified as I4, with a maximum air flow rate of 7000 CFM, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, capable of controlling presses #11 through #18, and exhausting to stack 4.

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

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2][40 CFR 52.21]

- (a) Pursuant to the Construction Permit (which was not numbered), issued on May 27, 1986, and revised through this Part 70 permit, the following conditions apply:
 - (1) The annual VOC input to Press #11 and Press #12 combined shall be limited such that the potential to emit does not exceed 66.24 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 66.24 \text{ tons}$. Therefore the requirements

- of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #11 and Press #12, and

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #11 and #12) with regard to 326 IAC 2-2 (PSD).

- (b) Pursuant to Construction Permit PC-84-1669, issued on November 25, 1987, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #13, Press #14, Press #15, and Press #16 combined shall be limited such that the potential to emit does not exceed 94 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 94 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #13, Press #14, Press #15, and Press #16.
- (c) Pursuant to Construction Permit PC-84-1842, issued on April 6, 1990, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #17 and Press #18 shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.9 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #17 and Press #18.

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #17 and #18) with regard to 326 IAC 2-2 (PSD).

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the eight (8) printing presses (Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(c)(3)(B), the catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) shall maintain a minimum destruction efficiency of 90%.

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 these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17, and Press #18) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) utilizing methods as approved by the

Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Compliance with the VOC limitations contained in Condition D.2.1 shall be determined by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 1, Unit 2, Unit 3, and Unit 4) to achieve compliance with conditions D.2.1 and D.2.2.

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

D.2.6 Catalytic Oxidizer Requirements

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 1, Unit 2, Unit 3, and Unit 4) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.2.1. and D.2.2, as approved by IDEM and VCAPC.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.2.7 Oxidizer Ganging

Oxidizer Unit 1, Unit 2, Unit 3, and Unit 4, are each designed to handle 7250 acfm of solvent laden air. These oxidizers are considered to be combined with the following restrictions:

- (a) Before any of the affected presses (Presses #11 through #18) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #11 through #18 are each rated at 3500 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.
- (c) In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- (d) In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es). Any press shut down in this fashion can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.

- (e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

D.2.8 Monitoring

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the eight (8) printing presses (Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the four (4) catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, 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 usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for each press monthly.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in conditions D.2.1 and D.2.5.
- (b) To document compliance with Condition D.2.6 and Condition D.2.7, records of each press and each oxidizer operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the minimum three (3) hour average temperature, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to oxidizer related problems.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (1) Flexographic printing press, identified as press #19, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (2) Flexographic printing press, identified as press #20, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (3) Flexographic printing press, identified as press #21, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (4) Flexographic printing press, identified as press #22, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (5) Flexographic printing press, identified as press #23, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (6) Flexographic printing press, identified as press #24, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (7) Flexographic printing press, identified as press #25, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (8) Flexographic printing press, identified as press #27, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (9) Flexographic printing press, identified as press #28, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (10) Flexographic printing press, identified as press #29, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (11) Flexographic printing press, identified as press #30, using catalytic oxidation for control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (12) Flexographic printing press, identified as Press 31, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (13) Flexographic printing press, identified as Press 32, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (14) Flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (15) Flexographic printing press, identified as Press 34, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (16) Flexographic printing press, identified as Press 35, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

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- (17) Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.
- (18) Catalytic Oxidizer, identified as I5, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 5.
- (19) Catalytic Oxidizer, identified as I6, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 6.
- (20) Catalytic Oxidizer, identified as I7, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 7.
- (21) Catalytic Oxidizer, identified as I8, with a maximum air flow rate of 8500 CFM, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 8.
- (22) Catalytic Oxidizer, identified as I9, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 9.
- (23) Catalytic Oxidizer, identified as I10, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 10.
- (24) Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 11.
- (25) Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #36, and exhausting to stack 12.

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

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

D.3.1 VOC Emissions [326 IAC 2-2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM and VCAPC have information that indicates that these emission units (Press #23, Press #24, and Press #25) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Press #23, Press #24, and Press #25) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 2-2][40 CFR 52.21]

- (a) Pursuant to Construction Permit CP-84-1896, issued on November 10, 1990, and revised through this Part 70 permit, the following conditions apply:
 - (1) The annual VOC input to Press #19 and Press #20 combined shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 39.9 tons. Therefore the requirements of 326 IAC 2-2

- (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #19 and Press #20, and
- (b) Pursuant to Construction Permit CP-167-2146, issued October 22, 1991, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #21 and Press #22 combined shall be limited such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.9 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #21 and Press #22.
- (c) Pursuant to Construction Permit CP-167-3392-00033, issued on April 11, 1994, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #23, Press #24, and Press #25 combined shall be limited such that the potential to emit does not exceed 74.1 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 74.1 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #23, Press #24 and Press #25.
- (d) Pursuant to Construction Permit CP-167-V014-00033, issued on May 30, 1997, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #27, Press #28, Press #29, and Press #30 combined shall be limited such that the potential to emit does not exceed 38.8 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 38.8 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #27, Press #28, Press #29 and Press #30.
- (e) Pursuant to Significant Source Modification 167-11568-00033, issued on February 1, 2000, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #31 and Press #32 combined shall be limited such that the potential to emit does not exceed 19.32 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 19.32 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #31 and Press #32.
- (f) Pursuant to SSM 167-12790-00033, issued on January 23, 2001, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #34 and Press #35 combined shall be limited such that the potential to emit does not exceed 16.85 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 16.85 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #34 and Press #35.

- (g) Pursuant to SSM 167-16521-00033, issued on April 10, 2003, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #33 shall be limited such that the potential to emit does not exceed 9.72 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 9.72 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
 - (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #33.
- (h) Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.99 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
 - (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #36.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the eight (8) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, and Press #36), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (b) Pursuant to 326 IAC 8-5-5(e)(3), the VOC capture systems on the nine (9) printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34 and Press #35), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum 60% overall control efficiency for flexographic printing.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the eight (8) catalytic oxidizers (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11, and Unit 12) shall maintain a minimum destruction efficiency of 90%.

D.3.4 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 these facilities and their control devices.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, and Press #25) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on each of these printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, and Press #35) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (c) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance

with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on Press #36 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

- (d) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 5 and Unit 6) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (e) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 7 and Unit 8) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (f) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC destruction efficiency tests on each of these catalytic oxidizers (Unit 9, Unit 10, Unit 11 and Unit 12) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Compliance with the VOC limitations contained in Conditions D.3.2 shall be determined by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11 and Unit 12) to achieve compliance with conditions D.3.2 and D.3.3.

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

D.3.7 Catalytic Oxidizer Requirements

- (a) The Permittee shall monitor Unit 5 and Unit 6 according to the following:
 - (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 5 and Unit 6) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
 - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
 - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average

temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

- (b) The Permittee shall monitor Unit 7 and Unit 8 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 7 and Unit 8) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 650°F. A three (3) hour average temperature that is below 650°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
 - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
 - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (c) The Permittee shall monitor Unit 9, Unit 10, Unit 11 and Unit 12 according to the following:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 9, Unit 10, Unit 11 and Unit 12) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 500°F. A three (3) hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
 - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.
 - (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.3.8 Oxidizer Ganging

Oxidizers Unit 9, Unit 10, Unit 11 and Unit 12, are each designed to handle 12, 750 acfm of solvent laden air. Oxidizers Unit 5, Unit 6, Unit 7 and Unit 8 are each designed to handle 8,500 acfm. These oxidizers are considered to be combined with the following restrictions:

- (a) Before any of the affected presses (Presses #19 through #25 and #27 through #36) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #19 through #25 are each rated at 4250 acfm. Presses #27 through #35 are each rated at 6375 acfm. Press #36 is rated at 4000 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.
- (c) In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- (d) In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es). Any press shut down in this fashion can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.
- (e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

D.3.9 Monitoring

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the sixteen (16) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, Press #35, and Press #36). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the eight (8) catalytic oxidizers (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11, and Unit 12) in order to determine if it has reached a point where its effectiveness is diminished to where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, 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 usage limits and/or the VOC emission limits established in Condition D.3.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for each press.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents.
 - (3) The total VOC usage for each month; and

- (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in conditions D.3.2 and D.3.6.
- (b) To document compliance with Condition D.3.7 and Condition D.3.8, records of each press and each oxidizer operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the minimum three (3) hour average temperature, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to oxidizer related problems.
- (c) To document compliance with Condition D.3.9, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if any are required).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (1) Flexographic in-line portable printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
- (2) Flexographic in-line portable printer attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (3) Flexographic in-line portable printer attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (4) Flexographic in-line portable printer attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (5) Flexographic in-line portable printer attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (6) Flexographic in-line portable printer attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (7) Flexographic in-line portable printer attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (8) Flexographic in-line portable printer attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (9) Flexographic in-line portable printer attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (10) Flexographic in-line portable printer attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (11) Flexographic in-line portable printer attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (12) Flexographic in-line portable printer attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (13) Flexographic in-line portable printer attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.

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

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

D.4.1 Volatile Organic Compounds (VOC) use [326 IAC 2-2][326 IAC 8-5-5]

- (a) The VOC delivered to in-line presses E5, E15, E17, E18, E19, E20, E22, E23, and E31 shall individually not exceed 25 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This condition results in these presses not being subject to the provisions of 326 IAC 8-5-5 (Graphic Arts Operations).
- (b) Pursuant to SSM 167-11853-00033, the VOC delivered to in-line Press E11 shall not exceed 18 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This condition results in the requirements of 326 IAC 2-2 (PSD) not being applicable to this press.

D.4.2 VOC Emissions [326 IAC 2-2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM and VCAPC have information that indicates that these emission units (E5, E15, E17, E18, E19, E22, E23, and E31) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (E5, E15, E17, E18, E19, E22, E23, and E31) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.4.1 shall be determined by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, 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 usage limits and/or the VOC emission limits established in Condition D.4.1.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent, used for each press monthly.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period (by press) using methods identified in condition D.4.3.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5

FACILITY CONDITIONS

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

(1) Closed Solvent Spray type parts washer exhausting to stack 20.

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.5.2 Volatile Organic Compounds (VOC) [326 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which

does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.6

FACILITY CONDITIONS

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

- (1) 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. [326 IAC 6-1-2]
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (3) "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM source. [326 IAC 6-1-2]
- (4) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

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

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

D.6.1 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) emissions from these facilities shall not exceed 0.03 grain per dry standard cubic foot.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section and VCAPC: 812-462-3433); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (IDEM Facsimile Number: 317-233-5967 and VCAPC Facsimile Number: 812-462-3447), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-6182-00033
 Facility: Press #11 and Press #12
 Parameter: VOC emission
 Limit: Combined emission less than 66.24 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #11			Press #12			Press #11 and Press #12 Combined
	Ton VOC this month	Ton VOC last 11 months	Ton VOC 12 month total	Ton VOC this month	Ton VOC last 11 months	Ton VOC 12 month total	Ton VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #13, Press #14, Press #15, and Press #16
Parameter: VOC emission
Limit: Combined emission less than 94 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #13, Press #14, Press #15, and Press #16 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #17 and Press #18
Parameter: VOC emission
Limit: Combined emission less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #17 and Press #18 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #19 and Press #20
Parameter: VOC emission
Limit: Combined emissions less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #19 and Press #20 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #21 and Press #22
Parameter: VOC emission
Limit: Combined emissions less than 39.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #21 and Press #22 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #23, Press #24, and Press #25
Parameter: VOC emission
Limit: Combined emissions less than 74.1 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #23, Press #24, Press #25, and Press #26 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #27, Press #28, Press #29, and Press #30
Parameter: VOC emission
Limit: Combined emissions less than 38.8 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #27, Press #28, Press #29, and Press #30 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #31 and Press #32
Parameter: VOC emission
Limit: Combined emissions less than 19.32 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #31 and Press #32 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #34 and Press #35
Parameter: VOC emission
Limit: Combined emissions less than 16.85 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #34 and Press #35 Combined		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-6182-00033
 Facility: In-line Presses E5, E15, E17, E18, E19, E20, E22, E23, and E31
 Parameter: VOC input
 Limit: Each press input less than 25 tons per 12 consecutive month period with compliance demonstrated at the end of each month. YEAR: _____

Press	Month: _____			Month: _____			Month: _____		
	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total	Ton VOC this month	Ton VOC past 11 months	Ton VOC 12 month total
E5									
E15									
E17									
E18									
E19									
E20									
E22									
E23									
E31									

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: In-line press E11
Parameter: VOC input
Limit: Input less than 18 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	In-line press E11		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #33
Parameter: VOC emission
Limit: Combined emissions less than 9.72 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #33		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-6182-00033
Facility: Press #36
Parameter: VOC emission
Limit: Combined emissions less than 39.99 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Press #36		
	Tons VOC this month	Tons VOC past 11 months	Tons VOC 12 month total

- 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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

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

Source Name: Bemis Company, Inc.
 Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Mailing Address: PO Box 905, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-6182-00033

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control**

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

Source Background and Description

Source Name: Bemis Company Inc.
Source Location: 1350 North Fruitridge Ave., Terre Haute, Indiana
County: Vigo County
SIC Code: 2673, 3081, and 3079
Operation Permit No.: T167-6182-00033
Permit Reviewer: Rob Harmon

The Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) have reviewed a Part 70 permit application from Bemis Company, Inc. relating to the operation of a polyethylene film plant including film production, printing, and converting operations.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Flexographic printing press (PCMC), identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press (PCMC), identified as press #2, installed in 1970, using no control, and exhausting to stack 202.
- (3) Flexographic printing press (PCMC), identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press (PCMC), identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press (PCMC), identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press (PCMC), identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press (PCMC), identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Flexographic printing press (PCMC), identified as press #11, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 1.
- (9) Flexographic printing press (PCMC), identified as press #12, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 1.
- (10) Flexographic printing press (PCMC), identified as press #13, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 2.
- (11) Flexographic printing press (PCMC), identified as press #14, using reverse angle doctor

- blades and catalytic oxidation for control, and exhausting primarily to stack 2.
- (12) Flexographic printing press (PCMC), identified as press #15, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 3.
 - (13) Flexographic printing press (PCMC), identified as press #16, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 3.
 - (14) Flexographic printing press (PCMC), identified as press #17, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 4.
 - (15) Flexographic printing press (PCMC), identified as press #18, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 4.
 - (16) Flexographic printing press (Windmoeller & Hoelscher), identified as press #19, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 5.
 - (17) Flexographic printing press (Windmoeller & Hoelscher), identified as press #20, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 5.
 - (18) Flexographic printing press (Windmoeller & Hoelscher), identified as press #21, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 6.
 - (19) Flexographic printing press (Windmoeller & Hoelscher), identified as press #22, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 6.
 - (20) Flexographic printing press (Windmoeller & Hoelscher), identified as press #23, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 7.
 - (21) Flexographic printing press (Windmoeller & Hoelscher), identified as press #24, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 7.
 - (22) Flexographic printing press (Windmoeller & Hoelscher), identified as press #25, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 8.
 - (23) Flexographic printing press (Windmoeller & Hoelscher), identified as press #26, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 8.
 - (24) Flexographic printing press (Windmoeller & Hoelscher), identified as press #27, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 9.
 - (25) Flexographic printing press (Windmoeller & Hoelscher), identified as press #28, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 9.
 - (26) Flexographic printing press (Windmoeller & Hoelscher), identified as press #29, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 10.

- (27) Flexographic printing press (Windmoeller & Hoelscher), identified as press #30, using reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 10.
- (28) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 31, using catalytic oxidation as control, and primarily exhausting to stack 11.
- (29) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 32, using catalytic oxidation as control, and primarily exhausting to stack 11.
- (30) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to ganged oxidizers. (Under construction, permitted in 2003)
- (31) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 34, using catalytic oxidation as control, and primarily exhausting to stack 12.
- (32) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 35, using catalytic oxidation as control, and primarily exhausting to stack 12.
- (33) One color, 2 side flexographic in-line portable printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
- (34) Closed Solvent Spray type parts washer using a solvent mixture containing 90% n-propyl and 10% isopropyl alcohol, with an internal volume of 5 cubic meters, with the closed system for control, and exhausting to stack 20.
- (35) Cyrel plate making facility exhausting to stack 23.
- (36) Catalytic Oxidizer (Tec System), identified as I1, with a maximum air flow rate of 7000 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, primarily controlling presses #11 and #12, and exhausting to stack 1.
- (37) Catalytic Oxidizer (Tec System), identified as I2, with a maximum air flow rate of 7000 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, primarily controlling presses #13 and #14, and exhausting to stack 2.
- (38) Catalytic Oxidizer (Tec System), identified as I3, with a maximum air flow rate of 7000 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, primarily controlling presses #15 and #16, and exhausting to stack 3.
- (39) Catalytic Oxidizer (Tec System), identified as I4, with a maximum air flow rate of 7000 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, primarily controlling presses #17 and #18, and exhausting to stack 4.
- (40) Catalytic Oxidizer (Dec-E-Tec), identified as I5, with a maximum air flow rate of 8500 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, primarily controlling presses #19 and #20, and exhausting to stack 5.
- (41) Catalytic Oxidizer (Dec-E-Tec), identified as I6, with a maximum air flow rate of 8500 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, primarily controlling presses #21 and #22,

and exhausting to stack 6.

- (42) Catalytic Oxidizer (Dec-E-Tec), identified as I7, with a maximum air flow rate of 8500 CFM, minimum inlet bed temperature of 650^{EF}, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, primarily controlling presses #23 and #24, and exhausting to stack 7.
- (43) Catalytic Oxidizer (Dec-E-Tec), identified as I8, with a maximum air flow rate of 8500 CFM, minimum inlet bed temperature of 650^{EF}, and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, primarily controlling presses #25 and #26, and exhausting to stack 8.
- (44) Catalytic Oxidizer (Dec-E-Tec), identified as I9, with a maximum air flow rate of 12750 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, primarily controlling presses #27 and #28, and exhausting to stack 9.
- (45) Catalytic Oxidizer (Dec-E-Tec), identified as I10, with a maximum air flow rate of 12750 CFM, minimum inlet bed temperature of 550^{EF}, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, primarily controlling presses #29 and #30, and exhausting to stack 10.
- (46) Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Oxidizer, identified as Unit 11 (or I-11), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 ^{EF}, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack 11.
- (47) Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Oxidizer, identified as Unit 12 (or I-12), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 ^{EF}, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack 12.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (1) Flexographic in-line portable printer (Flex-O-Line) attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (2) Flexographic in-line portable printer (Advance) attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (3) Flexographic in-line portable printer (Gloucester) attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (4) Flexographic in-line portable printer (Gloucester) attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (5) Flexographic in-line portable printer (Advance) attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (6) Flexographic in-line portable printer (Flex-O-Line) attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (7) Flexographic in-line portable printer (Flex-O-Line) attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.

- (8) Flexographic in-line portable printer (Advance) attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (9) Flexographic in-line portable printer (Windmoeller & Hoelscher) attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (10) Flexographic in-line portable printer (MAF-Italian) attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (11) Flexographic in-line portable printer (MAF-Italian) attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (12) Flexographic in-line portable printer (Gloucester) attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.
- (13) Storage tank for reclaim solvent blend (Modern Welding), identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (14) Storage tank for slow solvent blend (Modern Welding), identified as T2, capacity of 10,000 gallons, exhausting to stack 242.
- (15) Storage tank for fast solvent blend (Modern Welding), identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (16) Storage tank for hazardous waste storage of ink (Modern Welding), identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (17) Storage tank for reclaim solvent blend (Modern Welding), identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (18) Storage tank for slow solvent blend (Modern Welding), identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (19) Storage tank for fast solvent blend (Modern Welding), identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (20) Storage tank for hazardous waste storage of ink (Modern Welding), identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

Insignificant Activities

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

- (1) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. Bemis Company has 168 units which fit this description with a total capacity of 120,221,000 BTU per hour. Since none of these units are boilers, they would not be subject to 326 IAC 6.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) Combustion source flame safety purging on startup.
- (4) Vessels storing lubricating oils, hydraulic oils, and machining fluids.

- (5) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (6) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 0.7 kPA; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (7) Closed loop heating and cooling systems.
- (8) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (9) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (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. [326 IAC 6-1-2]
- (13) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (14) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (15) Purging of gas lines and vessels that is related to routing 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.
- (16) 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.
- (17) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (18) Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (19) Stationary fire pumps.
- (20) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (21) Filter or coalescer media changeout.
- (22) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (23) Farm operations.
- (24) Other categories with emissions below insignificant thresholds:
 - (A) Occasional hand wiping of adhesive backing for printing plates using 1,1,1 trichloroethane, insignificant HAP source.
 - (B) "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM

- source. [326 IAC 6-1-2]
(C) Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. [326 IAC 6-1-2]

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Approval of Construction (not numbered) issued on March 6th, 1980 (by Vigo County Air Pollution Control (VCAPC)).
- (2) Construction Permit (not numbered) issued on May 27, 1986 (by Vigo County Air Pollution Control (VCAPC)).
- (3) Construction Permit PC-84-1669 issued on November 25, 1987 (by the Indiana Department of Environmental Management (IDEM)).
- (4) A letter of registration issued on April 29, 1988 (by Vigo County Air Pollution Control (VCAPC)).
- (5) Construction Permit PC-84-1842 issued on April 6, 1990 (by IDEM).
- (6) Construction Permit CP-84-1896 issued on November 10, 1990 (by IDEM).
- (7) Construction Permit CP-167-2146 issued October 22, 1991 (by IDEM).
- (8) Operating Permit 33-2673-01-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC).
- (9) A letter of registration issued on June 11, 1993 (by IDEM).
- (10) Operating Permit 33-2673-02-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC) and September 6, 1996 (by VCAPC).
- (11) Operating Permit 33-2673-03-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC) and September 6, 1996 (by VCAPC).
- (12) Operating Permit 33-2673-04-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC) and September 6, 1996 (by VCAPC).
- (13) Operating Permit 33-2673-05-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC) and September 6, 1996 (by VCAPC).
- (14) Operating Permit 33-2673-06-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC), August 14, 1996 (by VCAPC) and May 30, 1997 (by VCAPC).
- (15) Operating Permit 33-2673-07-93 issued on January 14, 1993 (by VCAPC) and revised on June 22, 1993 (by VCAPC), August 14, 1996 (by VCAPC) and May 30, 1997 (by VCAPC).
- (16) Construction Permit CP-167-3392 issued April 11, 1994 (by IDEM).
- (17) Operating Permit 33-2673-08-93 issued on December 11, 1995 (by VCAPC) and revised on August 14, 1996 (by VCAPC) and May 30, 1997 (by VCAPC).

- (18) Construction Permit CP-167-V014-00033 issued on May 30, 1997 (by VCAPC).
- (19) Significant Source Modification 167-11568-00033 issued on February 1, 2000 (by VCAPC).
- (20) Significant Source Modification 167-11853-00033 issued on April 4, 2000 (by VCAPC).
- (21) Significant Source Modification 167-12790-00033 issued on January 23, 2001 (by VCAPC).
- (22) Significant Source Modification 167-16521-00033 issued on April 10, 2003 (by VCAPC).

All conditions from previous approvals were incorporated into this Part 70 permit. With the exception of changing the VOC input limitations such that they are all based on 12 consecutive month totals with compliance determined at the end of each month, and the removal of the now redundant press use limitations on Press #11 and Press #12.

Enforcement Issue

- (a) IDEM and VCAPC are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*. Some of this equipment would have been subject to PSD review.

IDEM and VCAPC are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

- (b) IDEM and VCAPC are aware that several of the in-line flexographic printing presses (E5, E15, E17, E18, E19, E20, E22, E23, and E31) are not in compliance with 326 IAC 8-5-5 which requires either use of low VOC coatings, or some VOC control equipment.

IDEM and VCAPC are reviewing this matter and have taken appropriate action. The Federally Enforceable Limitations in this proposed permit will allow the above specified printing presses to no longer be subject to those requirements.

- (c) IDEM and VCAPC are aware that the Printing Presses #17 and #18 have not been in compliance with the monthly and annual VOC use limits from previous permits.

IDEM and VCAPC are reviewing this matter and will take appropriate action.

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 June 24, 1996. Additional information was received on October 1, 1996, November 26, 1996, January 8, 1997, January 14, 1997, March 6, 1997, October 3, 1997, October 22, 1997, November 13, 1997, December 29, 1997, June 3, 1998, October 22, 1999, January 28, 2000, September 8, 2000, and April 11, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

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

Note: The source does not have any HAP emissions.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Volatile Organic Compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	NA
PM-10	less than 1
SO ₂	less than 1
VOC	1828
CO	less than 5
NO _x	less than 25

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission

units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Press #11 ¹				33.12			
Press #12 ¹				33.12			
Press #13 ²				23.52			
Press #14 ²				23.52			
Presses #15 and #16 ³				47			
Press #17 ⁴				23.52			
Press #18 ⁴				23.52			
Presses #19 and #20 ⁵				39.9			
Presses #21 and #22 ⁶				39.9			
Presses #23, #24, #25, and #26 ⁷				98.8			
Presses #27, #28, #29, and #30 ⁸				38.8			
Presses #31 and #32 ⁹				19.32			
Presses #34 and #35 ¹⁰				16.95			
In-line press #E-11 ¹¹				18			
Press #33 ¹²				9.72			
Total Emissions	Bemis Company, Inc. does not have any limitations based on the entire source.						

Notes:

¹Press #11 and Press #12 have existing conditions from Operating Permit 33-2673-02-93 (as amended). They are:

- Press #11 is limited to 33.12 tons of VOC per year. (This will be converted to a VOC input limit of 119.1 tons per 12 consecutive month period with compliance determined at the end of each month)
- Press #12 is limited to 33.12 tons of VOC per year. (This will be converted to a VOC input limit of 119.1 tons per 12 consecutive month period with compliance determined at the end of each month)
- Bemis has requested the above 2 limits be combined into emissions less than 66.24 tons of VOC per 12 year. (This is being granted as a combined VOC input limit of 238.2 tons per 12 consecutive month period with compliance determined at the end of each month)

- The VOC capture system on each press shall not operate more than 5430 hours per year with records kept for verification. (This limitation is now redundant after the change to VOC input limitations and is being removed)
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The presses must be operated in such a way as to ensure a minimum of 76% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.

²Press #13 and Press #14 have existing conditions from Operating Permit 33-2673-03-93 (as amended). They are:

- There is an existing pound per hour and equivalent ton per year limit in this permit that is not substantiated by the underlying construction permit. The limitation from the construction permit is for presses #13, #14, #15, and #16 combined and it is 7.83 tons of VOC emitted per month. This correction will be made in the Part 70 permit with the limitation being converted to a 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 76% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)

³Press #15 and Press #16 have existing conditions from Operating Permit 33-2673-04-93 (as amended). They are:

- There is an existing ton per month and equivalent ton per year limit in this permit that is not substantiated by the underlying construction permit. The limitation from the construction permit is for presses #13, #14, #15, and #16 combined and it is 7.83 tons of VOC emitted per month. This correction will be made in the Part 70 permit with the limitation being converted to a 12 consecutive month period with compliance determined at the end of each month.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- Also missing from this Operating Permit is the oxidizer performance requirements. Again, going back to the Construction Permit, the minimum performance must be a 76% capture efficiency on the VOC capture system on each printing press and a 95% destruction efficiency on the oxidizer.

⁴Press #17 and Press #18 have existing conditions from Operating Permit 33-2673-05-93 (as amended). They are:

- The VOC input to these 2 presses combined is limited to 11.96 tons per month (143.5 ton per year). This limit will be converted to a 12 consecutive month period with compliance determined at the end of each month. The operating permit also contained specific press pounds per hour and tons per year limitations, but these are not substantiated by anything so they will not be brought into the Part 70 permit.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 76% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)

⁵Press #19 and Press #20 have existing conditions from Operating Permit 33-2673-06-93 (as amended). They are:

- VOC input to these 2 presses combined is limited to 17.25 tons per month (207 tons per year). This limit will be converted to a 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 85% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 550 °F, with the temperature recorded for verification.

⁶Press #21 and Press #22 have existing conditions from Operating Permit 33-2673-07-93 (as amended). They are:

- VOC input to these 2 presses combined is limited to 17.25 tons per month (207 tons per year). This limit will be converted to a 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 85% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 550 °F, with the temperature recorded for verification.

⁷Press #23, Press #24, Press #25, and Press #26 have existing conditions from Operating Permit 33-2673-08-95 (as amended). They are:

- VOC input to these 4 presses combined is limited to 513.4 tons per 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 85% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 650 °F, with the temperature recorded for verification.

⁸Press #27, Press #28, Press #29, and Press #30 have existing conditions from Construction Permit CP167-V014-00033. They are:

- VOC input to these 4 presses combined is limited to 773 tons per 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 100% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 500 °F, with the

temperature recorded for verification.

⁹Press #31 and Press #32 have existing conditions from Significant Source Modification SSM167-11568-00033. They are:

- VOC input to these 2 presses combined is limited to 386.5 tons per 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 100% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 500 °F, with the temperature recorded for verification.

¹⁰Press #34 and Press #35 have existing conditions from Significant Source Modification SSM167-12790-00033. They are:

- VOC input to these 2 presses combined is limited to 337.31 tons per 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 100% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)
- The catalyst bed temperature shall be maintained at a minimum of 500 °F, with the temperature recorded for verification.

¹¹In-line press E11 has existing conditions from Significant Source Modification SSM167-11853-00033. They are:

- VOC input to this press is limited to 18 tons per 12 consecutive month period with compliance determined at the end of each month

¹²Press #33 has existing conditions from Significant Source Modification SSM167-16521-00033. They are:

- VOC input to this press is limited to 193.25 tons per 12 consecutive month period with compliance determined at the end of each month.
- The VOC capture system on each press must be operated in such a way as to ensure a minimum of 100% capture efficiency. The oxidizer must maintain at least a 95% destruction efficiency.
- The oxidizer shall be utilized at all times the presses are. (This is also subject to the oxidizer ganging language that allows some leeway as far as which oxidizer is in operation, so long as sufficient capacity is always on line. See the *Oxidizer Ganging* Section (page 19) for additional information)

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vigo County has been classified as attainment or unclassifiable for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

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:

- (a) 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.
- (b) 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) These flexographic printing presses and in-line flexographic printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430), Subpart QQ, due to the type of printing. Bemis Company, Inc. utilizes flexographic printing and this NSPS is specifically for publication rotogravure printing.
- (b) The storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Kb), due to size. They are all smaller than the 40 cubic meter threshold (10,567 gallons).
- (c) These flexographic printing presses and in-line flexographic printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart KK due to the fact that Bemis Company, Inc. is not a major source of Hazardous Air Pollutants (HAPs).
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart T because they are not a major source of Hazardous Air Pollutants (HAPs) and because the solvent utilized is not halogenated.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart JJJJ because they are not a major source of Hazardous Air Pollutants (HAPs).
- (f) This source is not subject to the requirements of the 112j of the Clean Air Act Amendments of 1990 because they are not a major source of Hazardous Air Pollutants

(HAPs).

(g) 40 CFR 64 Compliance Assurance Monitoring

(1) This source does operate a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC.

(A) with the potential to emit before controls equal to or greater than the major source threshold for VOC.

(B) that is subject to an emission limitation or standard for VOC; and

(C) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification.

(2) The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The provisions exempt sources and modifications which commenced construction prior to August 7, 1977. Most of the printing presses operated by Bemis Company, Inc. were constructed after that trigger date.

Bemis Company, Inc. is not in 1 of the 28 listed source categories which have a lower major source threshold. However, the potential emissions of the presses which were in operation prior to the trigger date exceeded the 250 ton per year (tpy) threshold (for VOC emissions) and therefore the source would have been considered an Existing Major source as of the trigger date. Changes after that date would then need a comparison to the significant increase thresholds (as applicable at the time). A review of Indiana's historic air rules found that modifications prior to 1981 would have each been compared to a 250 tpy VOC threshold. Modifications during or after 1981 would be compared to the current 40 tpy VOC 'significant' threshold since this source was considered an existing major source.

Key: Actual emission rates that appear to exceed the major source thresholds are shown in **bold**, with actual emission rates below those thresholds shown in normal text. All emission data provided is in Tons of VOC per calendar year (and rounded to the nearest tenth of a ton). NA in these tables represents Not Available.

Additionally, for the most part the OAQ and VCAPC simply do not have enough information to apply more than a year installed to some of these previously unpermitted presses. Therefore, instead of trying to combine emission units based on any 12 consecutive month period, this analysis has just used calendar years.

Pre 1977

Press #2 (installed 1970), Press #6 (installed 1969), Press #7 (installed 1974), Press #8 (installed 1974) and Press #9 (installed 1973) all predated the trigger date.

Analysis: These printing presses do not require any further review since they were in place prior to the effective date of the requirements.

1979

In-line Printer E2, In-line Printer E12, and In-line Printer E13 were all installed in 1979. These emission units were not reviewed at the time, but should have either undergone a PSD review or been limited to less than 250 tpy VOC combined. The emission units are being combined because they are the same type of unit (in-line printing presses that print simple logos or information on plastic film as it is being produced) and were constructed in the same time frame.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
In-line Printer E2	NA	NA	6.7	7.6	6.7	6.7	10.5	7.7	1.9	1.1
In-line Printer E12	NA	NA	2.9	2.9	2.9	1.9	3.8	0	0	0
In-line Printer E13	NA	NA	3.8	3.8	3.8	1.0	4.8	0.8	0	0
Total (E2, E12, and E13)	NA	NA	13.4	14.3	13.4	9.6	19.1	8.5	1.9	1.1

Analysis: As demonstrated by the emission table above (from Emission Statement Data), these printers have not emitted over the appropriate emission threshold (250 tpy), nor do they have combined PTE above that threshold. Therefore, no further review is required on these 3 units.

1980

Press #1, Press #10, and In-line Printer E20 were all installed in 1980. These emission units were not reviewed at the time, but should have either undergone a PSD review or been limited to less than 250 tpy VOC. In this case the three units are not being combined for review. Bemis has provided sufficient documentation to show that the In-line printers are a simple process which prints logos or information on plastic film as it is being produced, while the other presses are used for detailed (multicolor with extremely complicated graphics) printing work. Additionally, Press #1 and Press #10 are not being combined because they were initially purchased with the intent of installing them in 2 different plants (1 here and 1 in California). It was only after the plans for California fell through (due to air permitting issues) that the second press came to Terre Haute as well.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #1	101.3	67.8	91.7	121.3	108.9	100.3	91.7	96.6	166.4	166.0
Press #10	100.3	54.4	54.4	78.3	94.5	89.8	66.8	70.9	97.0	114.8
In-line printer E20	NA	NA	8.6	9.6	8.6	4.8	13.4	3.1	2.7	1.5

Analysis: As demonstrated by the emission table above (from Emission Statement Data), these printers have not emitted over the appropriate emission threshold (250 tpy), nor do they have individual PTE above that threshold. Therefore, no further review is required on these 3 units. However, the source shall maintain records to verify that these presses remain below PSD thresholds.

1981-1985 None

1986

Press #11, Press #12, In-line Printer E17, In-line Printer E18, In-line Printer E22, and In-line Printer E23 were all installed in 1986. Based on the same logic presented above, the In-line Printers and the Presses are being considered separately. This determination is primarily based on the type of markets each press can serve.

Press #11 and Press #12 were issued a construction permit issued in May of 1986. Each of these presses were limited to 33.12 tons of VOC per year. One existing press was removed as part of this permitting process (netting re-created below). The presses were limited to no more than 5430 hours of operation per year. They also were required to be controlled by an oxidizer during ozone season (later changed to at all times they were in operation as part of the ganging review). This limitation has been switched around from an emission standpoint to a VOC input standpoint (119.1 tons per 12 consecutive month period with compliance determined at the end of each month). This VOC input based approach also makes the hours of operation requirement redundant so it is being removed.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #11	22.3	19.8	19.8	44.9	44.2	26.0	31.7	19.3	22.9	25.4
Press #12	22.3	19.1	19.1	37.5	36.4	22.3	31.7	19.6	23.8	22.9
Total	44.6	38.9	38.9	82.4	80.6	48.3	63.4	38.9	46.7	48.3

Netting Analysis:

- The project itself was determined to have potential emissions of 66.24 tons VOC per year (33.12 ton per press, 2 presses).
- Press #4 was removed from service within the 5 year contemporaneous period.
- Press #4 emitted 27.37 tons VOC in 1981 and 30.64 tons VOC in 1982 (average of those 2 years is 29.00 tons of VOC). 1982 was the last year Press #4 was operated.
- Net Emissions Increase is: Project Emissions - Creditable Contemporaneous Decreases + Contemporaneous Increases. That is: $66.24 - 29.00 + 0.00 = 37.24$
- Since 37.24 tons of VOC per year is less than the PSD Significant level of 40 tons per year for VOC, this netting analysis shows Press #11 and Press #12 should not have any further need to be analyzed with regard to the PSD requirements.

Analysis: As demonstrated by the Netting Analysis above, these presses were appropriately reviewed with regard to the PSD requirements. However, more detailed review of the emission from 1996 and 1997 is required because the source reported emissions above their stated potential (and also above the limits). Bemis Company has also requested the emissions limit be combined for these 2 presses.

In-line Printer E17, In-line Printer E18, In-line Printer E22, and In-line Printer E23 were all installed in 1986. This happened after the Construction Permit for Press #11 and Press #12, so the contemporaneous period for that netting review would not be impacted. These emission units were not reviewed at the time, but should have either undergone a PSD review or been limited to less than 40 tpy VOC combined. The emission units are being combined because they are the same type of unit (in-line printing presses that print simple logos or information on plastic film as it is being produced) and were constructed in the same time frame.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002

In-line Printer E17	NA	NA	5.7	6.7	5.7	1.0	8.6	5.4	5.4	4.2
In-line Printer E18	NA	NA	7.6	8.6	7.6	3.8	11.5	3.1	3.9	4.2
In-line Printer E22	NA	NA	11.5	14.3	12.4	1.0	20.1	2.3	1.6	3.0
In-line Printer E23	NA	NA	6.7	7.6	6.7	1.9	10.5	4.6	0.8	3.4
Total (E17, E18, E22, and E23)	NA	NA	31.5	37.2	32.4	7.7	50.7	15.4	11.7	14.8

Analysis: As demonstrated by the table above, this set of In-line Printers has operated over the 40 tpy threshold (VOC). At this time the OAQ and VCAPC have developed language for the draft Part 70 permit because more review must be done to determine exactly how 326 IAC 2-2 (PSD) should be applied to these units.

1987

Press #13, Press #14, Press #15, and Press #16 were issued a construction permit (PC 84-1669) on November 25, 1987. This permit limited combined VOC emissions to 7.83 tons per month (94 tons per year). There was also a BACT determination done pursuant to 325 IAC 2-2-3 which set minimum oxidizer operating efficiencies. Background data is not provided, but that BACT reference comes from the PSD section of 325 IAC (which was later repealed and replaced by 326 IAC).

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #13	19.4	13.3	13.3	17.0	18.3	22.6	21.8	20.3	23.5	18.8
Press #14	19.4	15.7	15.7	16.8	15.9	14.6	15.4	13.6	17.8	19.8
Press #15	19.1	14.9	14.9	14.6	14.6	14.6	14.9	17.6	20.6	21.2
Press #16	19.1	13.8	13.8	15.4	22.0	18.3	19.6	22.2	23.4	18.3
Total (Press #13, #14, #15, and #16)	77.0	57.7	57.7	63.8	70.8	70.1	71.7	61.1	85.3	78.1

Analysis: These 4 Presses appear to have been properly reviewed and permitted. Therefore no additional review is required.

1988

In-line Press E5, In-line Press E15, and In-line Press E19 were installed in 1988. These emission units should have either undergone PSD review at that time or been limited to less than 40 tons per year of VOC emissions combined. These units are combined because of their similar function and market.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
In-line Printer E5	NA	NA	3.8	3.8	3.8	1.0	4.8	0	0	0

In-line Printer E15	NA	NA	6.7	7.6	6.7	2.9	10.5	4.6	2.3	1.9
In-line Printer E19	NA	NA	7.6	8.6	7.6	5.7	11.5	6.2	3.5	3.8
Total (E5, E15, and E19)	NA	NA	18.1	20.0	18.1	9.6	26.4	10.8	5.8	5.7

Analysis: As demonstrated by the table above, this set of In-line Printers (E5, E15, and E19) has not operated over the 40 tpy threshold (VOC). However, they have several years with actual emissions over the current draft 40% standard (16 tpy for VOC) IDEM is using to see if Injunctive Relief can apply. Therefore, all three of these units should have language in the draft Part 70 permit for this issue because more review must be done to determine exactly how 326 IAC 2-2 (PSD) should be applied to these units.

1989 None

1990

Press #17, Press #18, Press #19, and Press #20 were all issued construction permits in 1990 (PC 84-1842 for Presses #17 and #18; CP 84-1896 for Presses #19 and #20). Additionally, In-line Printer E31 was installed in 1990. The in-line printer (E31) is not being combined with any of the other presses for the same reasons as stated above (print type and primary market). Bemis has presented background information on why 2 different construction permits were issued within 8 months of each other. Press #17 and Press #18 were applied for together, and they completed the printing operations in Plant 1. They were American made (PCMC) printing presses and were identical in setup to 6 preceding presses (Press #11 through Press #16). Press #19 and Press #20 were to be the first 2 printing presses installed in a new expansion (Plant 2) and were German made. At that time Bemis felt they needed the construction permits before they could order the equipment, and with as long as 18 months of lead time between ordering and arrival they applied for the approvals immediately after the construction permit for press #17 and press #18 was issued. At the time both IDEM and VCAPC knew about the 2 applications, and IDEM chose to issue the approvals separately. Therefore, this review has been done without combining the 2 pairs of printing presses (17 and 18; 19 and 20).

Press #17 and Press #18 were issued a construction permit (PC 84-1842) on April 6, 1990. This permit limited combined VOC input to 11.96 tons per month (143.5 tons per year). At the minimum oxidizer efficiencies this is equal to 39.9 tons of VOC emission. Since this is below the 40 ton per year significant threshold the project was considered minor with regards to PSD.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #17	18.1	16.8	16.8	17.0	17.8	15.9	17.5	14.1	21.0	17.0
Press #18	18.1	17.3	17.3	21.8	17.3	19.9	19.1	17.0	17.7	17.3
Total (Press #17 and #18)	36.2	34.1	34.1	38.8	35.1	35.8	36.6	31.1	38.7	34.3

Analysis: As demonstrated by the emission table above, the presses (on a calendar year basis only) have operated below the 40 tpy threshold. Therefore, no further review is required on these 2 units.

Press #19 and Press #20 were issued a construction permit (CP 84-1896) on November 10, 1990. This permit was later amended on June 21, 1991, March 27, 1992 and May 28, 1993.

This permit limited the oxidizer efficiencies and also the VOC input. The input limit was set at 17.3 tons per month (207.3 tons per year). Since this is below the 40 ton per year significant threshold the project was considered minor with regards to PSD.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #19	16.4	13.4	13.4	15.3	15.4	12.5	13.2	16.7	16.1	17.6
Press #20	16.4	19.5	17.7	17.7	17.1	16.2	17.3	15.8	20.2	18.5
Total (Press #19 and #20)	32.8	32.9	31.1	33.0	32.5	28.7	30.5	32.5	36.3	36.1

Analysis: As demonstrated by the emission table above, the presses (on a calendar year basis only) have operated below the 40 tpy threshold. Therefore, no further review is required on these 2 units.

In-line Press E31 was installed in 1990. This emission unit should have either undergone PSD review at that time or been limited to less than 40 tons per year of VOC emissions.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
In-line printer E31	NA	NA	13.4	16.2	14.3	15.3	22.0	33.9	15.9	14.8

Analysis: As demonstrated by the table above, this In-line Printer has not operated over the 40 tpy threshold (VOC). However, the unit operated over the draft 40% threshold (16 tpy for VOC) that is used for Injunctive Relief determinations. At this time the OAQ and VCAPC have developed language for the draft Part 70 permit (for this printer) because more review must be done to determine exactly how 326 IAC 2-2 (PSD) should be applied to this unit.

1991

Press #21 and Press #22 were issued a construction permit (CP-167-2146) on October 22, 1991. This permit was amended on May 28, 1993. This permit limited the oxidizer efficiencies and also the VOC input. The input limit was set at 207.3 tons per year which is equivalent to a maximum emission rate of 39.9 tons of VOC per year. Since this is below the 40 ton per year significant threshold the project was considered minor with regards to PSD.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #21	16.9	17.1	17.0	16.2	15.4	12.7	10.7	14.0	14.2	13.7
Press #22	16.9	19.7	19.7	15.5	11.0	10.5	11.2	15.6	13.8	11.5
Total (Press #21 and #22)	33.8	36.8	36.7	31.7	26.4	23.2	21.9	29.6	28.0	25.2

Analysis: As demonstrated by the emission table above, the presses (on a calendar year basis only) have operated below the 40 tpy threshold. Therefore, no further review is required on these 2 units.

1992

None

1993

The Closed Solvent Spray type parts washer was issued a registration (CP 167-2946) on June 11, 1993. By definition registrations have less than 25 tons per year potential emissions of any criteria pollutant. Therefore this project had to be below the 40 ton per year PSD significant level.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Parts Washer	NA	NA	NA	NA	16.0	16.0	16.0	16.0	21.0	20.7

Analysis: The PTE that was determined as part of the registration review was 19.8. Therefore both 2001 and 2002 listed actual emissions above the previously stated PTE. This issue is currently under further review, but is most likely related to the calculation methods used to estimate emissions.

1994

Press #23, Press #24, Press #25, and Press #26 were issued a construction permit (CP-167-3392) on April 11, 1994. This permit was later amended on April 27, 1994 and November 2, 1995. This permit limited the oxidizer efficiencies and also the VOC input. Additionally, this approval required the removal of 2 existing printing presses which were not controlled. The VOC input limitation is 513.4 tons of VOC per year which is equivalent to 98.9 tons emitted per year. However, the net increase was only 24.8 tons of VOC per year after accounting for the removal of the 2 presses along with all the other contemporaneous increases and decreases. This net emission increase was below the PSD significant threshold of 40 tons per year. See the Analysis section below for additional information.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #23	NA	1.2	1.2	NR	12.3	9.6	10.8	11.7	16.4	19.1
Press #24	NA	NR	NR	NR	15.3	10.3	11.6	12.8	14.7	24.0
Press #25	NA	5.2	5.2	15.8	18.4	14.3	15.1	15.0	15.4	14.4
Press #26	NA	1.5	1.5	18.4	18.4	16.4	15.1	15.4	17.1	12.9
Total (Press #23, #24, #25, and #26)	NA	7.9	7.9	34.2	64.4	50.6	52.6	54.9	63.7	70.4

Netting: Because In-line Printer E31 (constructed in 1990) was not included in the netting analysis, the prior review was flawed. Once netting started all contemporaneous increases and decreases should have been included. E31 was definitely within the 5 year contemporaneous period. Therefore, the prior netting has to be recreated. From the previous netting, VOC is the only pollutant with enough emissions to be analyzed.

Description	Tons of VOC per year
Addition of Presses #23, #24, #25, and #26 (including catalytic oxidation)	99.1
Removal of Press #3 from service	-98.8
Removal of Press #5 from service	-114.5

Addition of Presses #17 and #18	39.9
Addition of Presses #19 and #20	39.9
Addition of Presses #21 and #22	39.9
Addition of Parts washer	19.3
Addition of In-line Printer E31 (since no prior limits the PTE from the Part 70 application is being used)	63
Total Net Emissions Change	87.8
PSD Significant Level	40
Significant ?	Yes

Analysis: The recreated netting indicates the project would have been considered Significant with regard to PSD. The OAQ and VCAPC have developed language for the draft Part 70 permit (for these 4 presses) because more review must be done to determine exactly how 326 IAC 2-2 (PSD) should be applied to this unit.

1995 - 1996 None

1997

Press #27, Press #28, Press #29, and Press #30 were issued a construction permit (167-V014-00033) on May 30, 1997. This permit limited the oxidizer efficiencies and when applied to the potential VOC input (773 tons per year) resulted in a after control potential of 38.8 tons per year. Since this is below the 40 ton per year significant threshold the project was considered to be minor with regards to PSD.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #27	NA	NA	NA	NA	2.1	6.9	7.4	5.5	6.2	4.6
Press #28	NA	NA	NA	NA	1.8	6.9	7.4	5.6	6.4	5.9
Press #29	NA	NA	NA	NA	1.2	7.3	6.7	5.4	4.5	5.7
Press #30	NA	NA	NA	NA	NA	NA	5.5	6.8	6.7	6.1
Total (Press #27, #28, #29, and #30)	NA	NA	NA	NA	5.1	21.1	27.0	23.3	23.8	22.3

Analysis: As demonstrated by the emission table above, the presses (on a calendar year basis only) have operated below the 40 tpy threshold. Therefore, no further review is required on these 4 units.

1998-1999 None

2000

Press #31 and Press #32 were issued a Significant Source Modification (SSM 167-11568-00033) on February 1, 2000. This permit limited the oxidizer efficiencies and also the VOC input. The input limit was set at 386.5 tons per year which is equivalent to a maximum emission rate of 19.32 tons of VOC per year, which is below the PSD significant threshold of 40 tons per year.

In-line Press E11 was issued a Significant Source Modification (SSM167-11853-00033) on April

4, 2000. This press was limited to no more than 18 tons of VOC used per year in order to be below the PSD threshold when combined with the approval for Press #31 and Press #32 above.

Press ID#	Actual VOC Emissions (from Bemis submitted Emission Statements, in Tons per Year)									
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Press #31	NA	NA	NA	NA	NA	NA	NA	8.6	7.8	6.2
Press #32	NA	NA	NA	NA	NA	NA	NA	1.9	8.2	7.8
In-line Printer E11	NA	NA	NA	NA	NA	NA	NA	5.4	0.4	0
Total (Press #31, #32, and E11)	NA	NA	NA	NA	NA	NA	NA	15.9	16.4	14.0

Analysis: Bemis has requested (based on the same logic stated above) that the In-line Printer be split off from those 2 presses. It really should not have been combined. A new review will be required to determine if they can be split apart and what the appropriate limits should be.

2001

Press #34 and Press #35 were issued a significant source modification (SSM167-12790-00033) on January 23, 2001. This permit limited the oxidizer efficiencies and also the VOC input. The VOC input limit is 337.31 tons of VOC per year which is equivalent to 16.95 tons per year of emissions, which is below the PSD significant threshold of 40 tons per year. These presses are too new to have the detailed emission history available for some of the older presses.

Analysis: These 2 presses were reviewed correctly with regard to the PSD requirements. No further review is required.

2003

Press #33 is currently being reviewed under SSM 167-16951-00033. This approval was sent out for Public Notice on February 18, 2003. It was issued on April 10, 2003. The VOC input combined with minimum capture and control efficiencies will limit the new equipment below the PSD Significant threshold.

Analysis: This press was reviewed correctly with regard to the PSD requirements. No further review is required.

Overall Summary:

With the information currently available the following emission units could all have problems, and therefore require further review.

The following units require review to determine how the PSD requirements under 326 IAC 2-2 should apply to them: In-line Printer E17, In-line Printer E18, In-line Printer E22, In-line Printer E23, In-line Printer E5, In-line Printer E15, In-line Printer E19, In-line Printer E31, Press #23, Press #24, Press #25, and Press #26.

The following units have reported actual emissions above previously determined PTE levels and require further review: Press #11 and Press #12, and Parts Washer.

Currently all these presses will have specifically developed (by OAQ and VCAPC) language in the Part 70 Permit so it can move forward. As more information becomes available further evaluations will be conducted.

These presses are being given placeholder language in order to keep the Part 70 approval moving and will be addressed specifically in a separate permit review. The following is an example of the specific

placeholder language that is being used:

The IDEM and VCAPC have information that indicates that these emission units (Press #11 and Press #12) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Press #11 and Press #12) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

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 VOC. 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 (Opacity Limitations)

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

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

326 IAC 6-1-2 (Particulate Matter)

Because Vigo County is listed under 326 IAC 6-1-7, particulate emitting units are subject to the requirements of 326 IAC 6-1-2. 326 IAC 6-1-2 establishes emission limits for general particulate emission facilities. Several insignificant activities fall into this category. They are: 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; Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations; "Oxydry" Anti-offset powder (cornstarch) applied to printed film, insignificant PM source; and Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. Pursuant to 326 IAC 6-1-2(a) emissions from these facilities shall not exceed 0.03 grain per dry standard cubic foot.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Particulate Matter)

326 IAC 6-1-2 establishes emission limits for general particulate emission facilities. Several insignificant activities fall into this category. They are: 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; Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations; "Oxydry" Anti-offset powder

(cornstarch) applied to printed film, insignificant PM source; and Polyethylene extrusion process, resins and manufacturing film using the blown film process, insignificant PM and VOC source. Pursuant to 326 IAC 6-1-2(a) emissions from these facilities shall not exceed 0.03 grain per dry standard cubic foot.

326 IAC 8-1-6 (General VOC reduction requirements)

This rule is applicable to VOC emission units that were constructed after January 1, 1980 and that have potential emissions greater than 25 tons per year that are not regulated by some other requirement in 326 IAC 8. This requirement could be applicable even to flexographic printing, which is normally reviewed under 326 IAC 8-5-5, because of the gap (from January 1, 1980 to November 1, 1980) in the applicability dates of the rules.

- (a) The following emission units are not subject to 326 IAC 8-1-6 because they are already subject to 326 IAC 8-5-5 (for detailed reasons why read the description below): Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17, Press #18, Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, Press #26, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #34, and Press #35.
- (b) The flexographic printing presses which were constructed prior to January 1, 1980 are not subject to 326 IAC 8-1-6 because of the construction date. Those presses are: Press #2, Press #6, Press #7, Press #8, Press #9, E2, E12, and E13.
- (c) Press #1 and Press #10 are both subject to the requirements of 326 IAC 8-1-6. However, it has been determined that BACT at that time would have most likely been no emission control. The PTE of each press is equivalent to 212 tons per year. Any change or modification which increases the potential to emit shall require prior OAQ approval.

326 IAC 8-3 (Volatile Organic Compounds)

Pursuant to 326 IAC 8-3 the Closed Solvent Spray parts washer is subject to the requirements under both 326 IAC 8-3-2 and 326 IAC 8-3-5.

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (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.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent

volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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

- (a) The following flexographic printing presses are subject to the requirements of 326 IAC 8-5-5 because they were constructed after November 1, 1980: Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17, Press #18, Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, Press #26, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, and Press #35.

Pursuant to 326 IAC 8-5-5(e) (Graphic Arts Operations), the minimum overall control efficiency is 60% for flexographic operations. Additionally, Bemis is not required to meet the solvent VOC content limitations in 326 IAC 8-5-5(c) because the design destruction efficiency is above the 90% minimum specified in 326 IAC 8-5-5(c)(3)(C).

Sufficient catalytic oxidation capacity shall be in operation at all times these printing presses are in operation, in order to comply with this limit.

- (b) The flexographic printing presses which were constructed prior to November 1, 1980 are not subject to 326 IAC 8-5-5 because of the age and the fact that Vigo County is not one of the specifically listed counties. Those presses are: Press #1, Press #2, Press #6, Press #7, Press #8, Press #9, Press #10 (started construction), E-2, E-12, and E-13.
- (c) The flexographic printing presses which were constructed after November 1, 1980 that have been specifically limited below 25 tons per year each are not subject to 326 IAC 8-5-5 (and therefore are exempt from 326 IAC 8-1-6 as well) because of that limitation. This Part 70 Permit establishes those limitations for the following presses: E-5, E-15, E-17, E-18, E-19, E-20, E-22, E-23, and E-31.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources and facilities constructed between October 7, 1974 and January 1, 1980 with 100 tpy potential VOC emissions. The only units installed within that time frame (In-line printer E2, in-line printer E12, and in-line printer E13) do not meet the potential emission threshold. Therefore, 326 IAC 8-6 does not apply.

Oxidizer Ganging

Bemis Company has 2 different set of oxidizers that have been 'ganged together' (their terminology) for purposes of flexibility. When most of the controlled printing presses Bemis operates were installed they were listed as a pair of flexographic presses controlled by a specific oxidizer. If that oxidizer had problems then the 2 associated printing presses had to be shut down, and could not be restarted until the oxidizer problem had been resolved. By adding ductwork to group the oxidizers together Bemis could then bring an unused oxidizer up and get those presses back into operation with the same level of control as required. This addition also makes it much easier for Bemis to schedule routine maintenance on the oxidizers. Both sets of 'ganged' oxidizers were reviewed by VCAPC and IDEM and approved prior to the equipment being added.

The specific requirements for the first set of oxidizers:

Oxidizer Unit 1, Unit 2, Unit 3, and Unit 4, are each designed to handle 7250 acfm of solvent laden air. These oxidizers are considered to be combined with the following restrictions:

- Before any of the affected presses (Presses #11 through #18) can operate, one oxidizer shall be warmed up, and operational;
- Presses #11 through #18 are each rated at 3500 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.
- In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down. They can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.
- A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

And, the specific requirements for the second set of oxidizers:

Oxidizers Unit 9, Unit 10, Unit 11 and Unit 12, are each designed to handle 12, 750 acfm of solvent laden air. Oxidizers Unit 5, Unit 6, Unit 7 and Unit 8 are each designed to handle 8,500 acfm. These oxidizers are considered to be combined with the following restrictions:

- Before any of the affected presses (Presses #19 through #32 plus Press #34 and Press #35) can operate, one oxidizer shall be warmed up, and operational;
- Presses #19 through #26 are each rated at 4250 acfm. Presses #27 through #32 plus Press #34, Press #35 and Press #33 are each rated at 6375 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.

- In the event that the currently operating oxidizers are at their maximum input airflow, one (1) additional oxidizer shall be warmed up and on standby (if available).
- In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down. They can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.
- A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

These requirements are in place in order to ensure that all solvent laden streams are being adequately controlled at any given time, while still offering the source additional flexibility of operation.

Testing Requirements

Bemis Company Inc. operates 24 printing presses that utilize 12 catalytic oxidizers in order to achieve compliance. Each of these printing presses have potential VOC emissions in excess of 40 tons per year (before control) and therefore are subject to periodic testing under the current testing guidance. These units should be tested twice per permit term for VOC Capture and Destruction Efficiency (approximately every 2 ½ years).

However, several of these units are identically set up and the testing could reasonably be reduced to just a portion of the identical units (with the other units only being tested if a problem is detected). The following groups are identical:

- Presses #11 through #18 (8)
- Presses #19 through #26 (8)
- Presses #27 through #35 (9)
- Catalytic oxidizers I1-I4 (4)
- Catalytic oxidizers I5 and I6 (2)
- Catalytic Oxidizers I7 and I8 (2)
- Catalytic Oxidizers I9 through I12 (4)

Each group containing less than 5 units shall test 1 representative unit each cycle.
Each group containing between 6 and 12 units shall test 2 representative units each cycle.
The particular units to be tested out of each group must change from cycle to cycle.

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, OAQ and VCAPC, 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 Section D of the permit 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The printing presses, that have specific capture efficiency requirements (Presses #11 through #35), have applicable compliance monitoring conditions as specified below:
 - Quarterly the components of the capture system shall be inspected for proper operation.
2. The catalytic oxidizers (Oxidizers I-1 through I-12) have applicable compliance monitoring conditions as specified below:
 - The inlet temperature to the catalyst bed shall be continuously monitored. If the temperature reading begins to drop below the minimum (which varies with the specific minimum temperatures being outlined in the respective D Section of the Permit), an automated control system shall adjust the operation accordingly. If the temperature can not be maintained, the printing presses relying on this oxidizer for control shall be shut down until the inlet temperature can be maintained or the VOC laden emissions stream can be sent to another catalytic oxidation unit.
 - Annually the catalyst shall be sampled and tested to ensure it is still active. If testing indicates the catalyst can no longer maintain the minimum 95% destruction efficiency at the current minimum temperature then it shall be replaced.

These monitoring conditions are necessary because the capture systems and the catalytic oxidation systems for the printing presses must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations) and in order to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

The oxidation systems must be in operation at all times the printing presses are in operation.

Conclusion

The operation of this polyethylene film plant including film production, printing and converting operations shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-6182-00033**.

**Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control**

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	Bemis Company, Inc.
Source Location:	1350 Fruitridge Ave., Terre Haute, Indiana 47804
County:	Vigo County
SIC Code:	2673, 3081, and 3079
Operation Permit No.:	T167-6182-00033
Permit Reviewer:	Rob Harmon

On October 4, 2003, Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune-Star, Terre Haute, Indiana, stating that Bemis Company, Inc. had applied for a Part 70 Operating Permit to operate a polyethylene film plant including film production, printing, and converting operations. The notice also stated that VCAPC proposed to issue a permit for this operation 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 October 6, 2003, November 6, 2003 and April 5, 2004, Bemis Company, Inc. submitted comments on the proposed Part 70 permit. Additions to permit conditions are in **bold** while deleted text is ~~strikeout~~. Due to the following comments as well as OAQ and VCAPC changes, the permit condition numbers may not match the Public Notice version. Those changes have been made throughout the Permit including the Table of Contents. The summary of the comments is as follows:

Comment 1:

The Bemis Company Inc. wishes to inform you of our plans to remove Press 26. The press located in Plant II will be relocated very soon to a Bemis owned paper plant in Omaha, Nebraska. Press 26 was originally permitted with Presses 23, 24, and 25. The total input VOC's combined was 513.4 TPY. The four presses were limited to 42.78 tons per month or 10.695 tons per press.

Response to Comment 1:

All references to Press 26 have been removed from the Proposed Permit. The limitation had to be revised as a result of this removal because the old limit was set by the PTE of the 4 individual presses combined. With the removal of 1 press the limit can not exceed the PTE of the remaining 3 presses in this grouping. This included: the removal of Condition A.2 (23) and subsequent renumbering the rest of Condition A.2; Item (8) of the Facility Description in Section D.3 was removed with the remaining items renumbered; and the appropriate report form was updated to match the appropriate limitations, Additionally, the following Conditions under Section D.3 were changed as follows:

Condition D.3.1:

The IDEM and VCAPC have information that indicates that these emission units (Press #23, Press #24, **and** Press #25 ~~and Press #26~~) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Press #23, Press #24, **and** Press #25 ~~and Press #26~~) with regards to 326 IAC 2-2 (PSD). The OAQ and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

Condition D.3.2(c): See Response to Comments 21 and 22.

Condition D.3.3(a): See Response to Comments 21 and 22.

Condition D.3.5(a): See Response to Comment 23.

Condition D.3.7 (a) and (b):

- (a) Before any of the affected presses (Presses #19 through **#25 and #27 through #35**) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #19 through **#25 #26** are each rated at 4250 acfm. Presses #27 through #35 are each rated at 6375 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.

Condition D.3.8(a):

The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the sixteen (16) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, ~~Press #26~~, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, and Press #35). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 2:

Page 5, Section A. The permit states: "However, the Permittee should be aware that a physical change or a change in 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."

Comment: While we appreciate the reminder, changes that would require permit modifications are independent of impact on the descriptive information. Therefore the statement is somewhat misleading and should be deleted.

Response to Comment 2:

This statement in Section A is specifically intended to differentiate between general description changes (which are not enforceable) and changes requiring prior approval, which may include description changes. Therefore, no change has been made.

Comment 3:

Page 7. Item #33. States "using a solvent mixture containing 90% n-propyl and 10% isopropyl alcohol, with an internal volume..."

Comment: The solvent parts washer uses a reclaimed solvent material that varies in blend from batch to batch. Request the language to read "using a reclaim solvent mixture, with an internal volume..."-

Response to Comment 3:

This request was changed by Comment 52. The language that was incorporated into the Permit appears in Response to Comment 52.

Comment 4:

Page 11, Condition B.10 (a) The provision sets out the timing for submittal of annual compliance reports.

Comment: The draft language has some semantical inconsistencies between initial and subsequent notifications. We would suggest: "The initial certification shall cover the time period from the date of the final permit issuance through December 31 of the same year, with submittal of the certification due by July 1 of the following year. Certifications for all subsequent years shall cover the time period from January 1 through December 31, with submittal of the certification due by July 1 of the following year."

Response to Comment 4:

The requested change has been made. Condition B.10(a) now reads as follows:

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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year, **with submittal of the certification due by July 1 of the following year. Certifications for all** ~~At~~ subsequent **years** ~~certifications~~ 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~~ **with submittal of the certification due by July 1 of each the following year to:**

Comment 5:

Page 27. Condition C.18 (a) & (d) The provision and accompanying provisions require: "Quarterly submittal of Deviation and Compliance Monitoring Reports and submittal of reports within 30 days of the end of the quarter."

Comment: 326 IAC 2-7-5(3)(C)(i) requires the submittal of the above mentioned reports at least every six months. EPA's selection of six months as a minimum suggested reporting frequency recognizes the greatly expanded administrative burden that the requirement imposes on affected sources. EPA is fully cognizant of the detrimental impact that undue administrative burdens can have on implementation of facility environmental management programs. To the best of our recollection, all of the numerous Part 70 permits issued to Bemis Company operations across the country have Deviation and Compliance Monitoring reporting set on a six month frequency. In addition, the 30 days submittal requirement is expeditious in light of the expanded reporting requirement. The material review and compilation necessary to develop the reports are not that dissimilar from what is needed to file annual emission reports that have six month submittal requirements. The standard frequency for report submittal is 90 days. Bemis would request modifying the requirements in the permit to reflect national standards of reporting every 6 months with the report submittal due within 90 days.

Response to Comment 5:

326 IAC 2-7-5(3)(c)(i) sets out the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. The OAQ and VCAPC maintain that reporting deviations every six months is not adequate to ensure that the cause of any reoccurring deviation is corrected in a timely fashion. Quarterly has been determined to be a reasonable amount of time to report non-emergency deviations, rather than the shorter reporting times required by the Emergency Provisions. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

No change has been made as a result of this comment regarding changing from quarterly report to semi-annual report.

Comment 6:

Page 29. Condition D.1 (12) The permit identifies the exhaust stack for storage tank T4 as stack 241.

Comment: The stack number is in error. The correct number is 244.

Response to Comment 6:

The change was made as requested. The description now reads:

Storage tank for hazardous waste storage of ink (Modern Welding), identified as T4, capacity of 6,000 gallons, exhausting to stack ~~244~~ 244.

Comment 7:

Page 30. Condition D.1.2 (a) & (b) Condition (a) spells out specific recordkeeping requirements that are purportedly necessary to establish compliance with VOC usage limits and/or VOC emission limits established in Condition D.1.1. Condition (b) sets out maintenance requirements for the records.

Comment: Condition D.1.1 establishes no VOC usage limitations or VOC emission limitations for the affected process lines. Consequently conditions D.1.2 (a) & (b) are irrelevant and should be deleted.

Response to Comment 7:

IDEM and VCAPC have determined that 326 IAC 8-1-6 does not apply because these units pre-date the applicability date of January 1, 1980. Pursuant to CP, 33-3079-C1-80, issued on April 10, 1980 Press #1 and Press #10 were limited to less than 100 tpy VOC emissions. However, this is not being incorporated into the Part 70 because this limit was based on the 326 IAC 8-1-6 rule established in October of 1980. Since the rule has been revised since the issuance of this permit, this limit is no longer appropriate. In addition, based on the new rule, these presses would not be subject to such rule as discussed above.

Therefore, Conditions D.1.1 and D.1.2 are not appropriate and have been deleted. The revision of Section D.1 was done as follows:

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

~~**D.1.1 Volatile Organic Compound (VOC) Use [326 IAC 8-1-6]**~~

~~(a) Pursuant to 326 IAC 8-1-6, BACT for Press #1 has been determined to be no control. Any change or modification which increases potential to emit shall require prior OAQ approval.~~

~~(b) Pursuant to 326 IAC 8-1-6, BACT for Press #10 has been determined to be no control. Any change or modification which increases potential to emit shall require prior OAQ approval.~~

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

~~**D.1.2 Record Keeping Requirements**~~

~~(a) To document compliance with Condition D.1.1, 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 usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

~~(1) The VOC content of each coating material and solvent used.~~

~~(2) The amount of coating material and solvent less water used on a monthly basis.~~

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~

- ~~_____~~
~~_____ (3) The cleanup solvent usage for each month;~~
~~_____ (4) The total VOC usage for each month; and~~
~~_____ (5) The weight of VOCs emitted for each compliance period per press.~~
~~_____ (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

There are no specific applicable requirements for these emission units.

Comment 8:

Page 31. Condition D.2.1 discusses the possibility that presses 11 & 12 may be subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration)

Comment: Further review is required to prove whether a violation even exists and as such, the Permit Shield provided by Condition B.13 may indeed apply. Since this is not a foregone conclusion we request that this section be worded more appropriately.

Response to Comment 8:

This language was based upon actual emission data provided to IDEM and VCAPC by Bemis. This data shows actual emissions above the PSD Significant levels. Specifically for Presses #11 and #12 identified in Condition D.2.1, Bemis reported actual emissions of 82.4 tons of VOC in 1996 and 80.6 tons of VOC in 1997. Those were both in excess of the 66.24 tons of VOC per year which was used in the netting analysis. Additionally, Presses #17 and #18 exceeded the monthly combined input limit several times and the 12-month total once. The permit shield can not be in effect in any circumstance where the existing limits do not ensure compliance with the applicable requirements. Bemis is required to submit a PSD BACT analysis to IDEM and VCAPC which must be certified by the Responsible Official. IDEM and VCAPC have changed how this is stated in the Part 70 Permit. Condition D.2.1 has been deleted with the rest of the Conditions in Section D.2 renumbered as a result.

~~D.2.1 VOC Emissions [326 IAC 2-2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]~~

~~The IDEM and VCAPC have information that indicates that these emission units (Press #11 and Press #12) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Press #11 and Press #12) with regards to 326 IAC 2-2 (PSD). The OAG and VCAPC will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.~~

Due to the change outlined above, Condition D.2.2 is now revised as D.2.1. The following has been added to Condition D.2.1(a).

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #11 and #12) with regard to 326 IAC 2-2 (PSD).

The following has been added to Condition D.2.1(c).

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #11 and #12) with regard to 326 IAC 2-2 (PSD).

Comment 9:

Page 32. Condition D.2.1 (a), (b) & (c) Each of the conditions establishes an annual operational CAP on the specified process lines or group of process lines based on VOC input.

Comment: In each of the instances, the VOC input limitations were derived from emission limitations. There is no justification for the conversion of the emission limitation into an input based limitation, especially since the goal of the condition is solely based on annual emissions. In fact, there are many drawbacks to the use of an input limitation. First, the input limitation is not protective of the emission limitation under all circumstances, e.g. malfunctions or miscellaneous VOC usage operations (cleaning) that may not be controlled to the level achieved during normal process operations. Second, the input based limit provides no incentive for control enhancements thereby limiting operational flexibility. Such limitations would actually result in increased facility emissions.

In most cases, imposition of VOC input limitations resulted from a misreading of EPA's June 13, 1989 memorandum entitled "Guidance on Limiting Potential to Emit in New Source Permitting". Subsequently, EPA has recognized that the 1989 guidance has been imposed in an overly restrictive manner and as such has issued guidance to clarify their intent. Specific to the printing industry, EPA has issued two documents offering guidance on both the acceptability and advantages of avoiding operational limitations in favor of emission limitations. The guidance was first presented in the EPA document entitled White Paper #3. Attachment A provides an excerpt from White Paper #3 fully discussing this issue. EPA has gone on to offer additional guidance in this area via the draft Technical Support Document for Title V permitting of Printing Facilities issued on November 22, 2002 (see relevant excerpt in Attachment B). Bemis has worked very closely with US EPA's Office of Air Quality Planning and Standards to assist in their understanding of our industry in the interest of developing appropriate guidance. As stated in both guidance documents, EPA concludes that a proper formula based emission approach fully provides enforceable limitations. We therefore request that such input limitations be removed throughout this permit.

Comment 10:

Page 32. Condition D.2.2 (a) & (b) Condition (a) sets out a minimum required capture efficiency of 76%. Condition (b) sets out a minimum required destruction efficiency of 95%.

Comment: Individualized efficiencies are not imperative or intrinsic to the goal of the condition. In the development of RACT guidance, EPA did set a minimum destruction efficiency premised on obtaining good combustion. It is requested that the control requirement be based on a minimum overall efficiency, i.e. 72.2% with a minimum destruction of 90%.

Response to Comments 9 and 10:

It is acceptable to convert the calculated VOC input limits to VOC emission based limits. It is also acceptable to convert the individual capture efficiency and control efficiency limits into a combined overall control efficiency, so long as the minimum capture and control requirements from 326 IAC 8-5-5 are still met. First, Condition D.2.2 has been modified to remove the extra efficiency limitations. It now reads:

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) **Pursuant to 326 IAC 8-5-5(e)(3)**, the VOC capture systems on the eight (8) printing presses (Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17 and Press #18), **in combination with the catalytic oxidation systems**, shall be operated in such a manner to attain and maintain a minimum of ~~76% VOC capture efficiency. This condition, in combination with (b) below, will also satisfy the requirements of 326 IAC 8-5-5 (graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.~~
- (b) **Pursuant to 326 IAC 8-5-5(c)(3)(B)**, the catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) shall maintain a minimum destruction efficiency of ~~90%~~ **95%**. ~~This condition will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires either a minimum destruction efficiency of 90% or solvent content limitations.~~

The overall control limitation which is required to make the requirements of 326 IAC 2-2 (PSD) not applicable, has been added to a re-organized Condition D.2.1. The minimum overall control efficiencies were determined by combining the previously specified capture and control requirements (example: 76%

capture and 95% destruction is equal to 72.2% overall control because 24% is never captured and 3.8% was captured but not destroyed; $100\% - 24\% - 3.8\% = 72.2\%$) to make the requirements of PSD not applicable. Condition D.2.1 now reads:

D.2.1 Volatile Organic Compound (VOC) Use [326 IAC 2-2][40 CFR 52.21]

- (a) Pursuant to the Construction Permit (which was not numbered), issued on May 27, 1986, **and revised through this Part 70 permit, the following conditions apply:**
- (1) The **annual** VOC input to Press #11 and Press #12 combined shall be limited **such that the potential to emit does not exceed 66.24 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 66.24$ tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 238.2 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.2.3 below, this limitation is equivalent to an emission limit of 66.24 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #11 and Press #12.**

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #11 and #12) with regard to 326 IAC 2-2 (PSD).

- (b) Pursuant to Construction Permit PC-84-1669, issued on November 25, 1987, **and revised through this Part 70 permit, the following conditions apply:**
- (1) The **annual** VOC input to Press #13, Press #14, Press #15, and Press #16 combined shall be limited **such that the potential to emit does not exceed 94 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 94$ tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 338.1 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.2.3 below, this limitation is equivalent to an emission limit of 94 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #13, Press #14, Press #15, and Press #16.**
- (c) Pursuant to Construction Permit PC-84-1842, issued on April 6, 1990, **and revised through this Part 70 permit, the following conditions apply:**
- (1) The **annual** VOC input to Press #17 and Press #18 shall be limited **such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.9$ tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 143.5 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control**

requirements listed in Condition D.2.3 below, this limitation is equivalent to an emission limit of 39.9 tons per year.

- (2) **The Permittee shall maintain a minimum overall control efficiency of 72.2% for VOC emissions from Press #17 and Press #18.**

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #17 and #18) with regard to 326 IAC 2-2 (PSD).

As a result of these changes the appropriate reporting forms were updated as well.

Comment 11:

Page 32. Condition D.2.4 (a) The condition sets out periodic capture testing requirements for the affected process lines.

Comment: Unless a press employs a permanent total enclosure, the "capture system" is intrinsic to the operation of the press. Excluding the ductwork from the press to the oxidizer, the capture system consists of the press dryer mechanism. The dryer systems are designed to operate under negative pressure and once installed do not change significantly. A poorly performing dryer system would not allow for proper drying of inks, thereby resulting in noticeable performance problems in the end use printed product.

EPA's position on capture testing of printing presses is that a press must have an initial capture test, but that a re-test is not needed unless the source makes a change in operations in a way that could affect capture efficiency. Such changes include; decreasing blower rating, adding printing stations on a press, increasing the distance between print stations and dryers and adding or removing floor sweeps. This guidance is spelled out in Section 4.4 of the TSD for Title V Permitting of Printing Facilities (see Attachment C) and is further illustrated in Appendix C of the same TSD. EPA has stated that the above position will be presently more clearly in the final document. As noted in Appendix C, EPA's suggested Compliance Assurance Monitoring guidance with respect to capture efficiency on printing operations focuses on integrity of ductwork from the press to the oxidizer as well as proper operation of ductwork interlocks. With adoption of this guidance, periodic capture testing should not be required and we request this requirement be removed throughout this permit.

Response to Comment 11:

IDEM, OAQ and VCAPC feel the capture and control systems are necessary in order to comply with the provisions established in D.2.1 and D.2.2. If either of these systems is not functioning properly the actual emission rates would be significantly increased. As a result, periodic testing and verification of system integrity are necessary parts of this Part 70 Permit. Even though major problems can be identified by inspections or operational problems, minor problems such as broken gaskets, seals, or other items could be overlooked. These minor problems could reduce the capture effectiveness. An error in the prior application of the testing frequency was found as a result of the review to respond to this comment. An error in interpretation was made regarding "identical units". Based on this error IDEM and VCAPC allowed only 2 of 8 presses to be required to test. However, printing presses are not considered identical units. Printing press emissions are very job dependant. They have variable solvent loading, line speed, and print width (to name a few parameters). Therefore, the testing requirements have been changed to require each unit be tested once every 2.5 years. Under 326 IAC 2-7-5 and 2-7-6, IDEM and VCAPC have the authority to establish testing requirements sufficient to assure compliance with the terms and conditions of this permit. This frequency (once per 2.5 years) is required because each of these presses have potential emissions greater than 100 tpy VOC before control. Condition D.2.4 now reads:

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.2.1 and D.2.2**, the Permittee shall perform VOC capture efficiency tests on ~~each two (2)~~ **each** of these printing presses (Press #11, Press #12, Press #13, Press #14, Press #15, Press #16, Press #17, and Press #18) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of

this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.

- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.2.1 and D.2.2**, the Permittee shall perform VOC destruction efficiency tests on **each one (1)** of these catalytic oxidizers (Unit 1, Unit 2, Unit 3, and Unit 4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 12:

Page 32/33. Condition D.2.5 The condition states: "Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets."

Comment: The manufacturer only issues "as supplied" data sheets. Data for all applications are solely based on the individual "as supplied" data. The term "as applied" is irrelevant and should be deleted.

Response to Comment 12:

326 IAC 8-1-4 contains the testing procedures for sources and emission units subject to as-applied VOC limitations somewhere within Article 8. However, the applicable Article 8 requirement in this case is from 326 IAC 8-5-5(c)(3) which is a control equipment standard, not an as-applied VOC limitation. The only other VOC related conditions in this Section appear in Condition D.2.1, and are VOC emission limits either to comply with the Prevention of Significant Deterioration requirements (326 IAC 2-2) or to make them not applicable. Once again there is no correlation between these limits and the VOC content of the inks as-applied. Therefore, Condition D.2.5 has been replaced with an alternate Compliance Determination. This same logic applies to the provisions contained in Conditions D.3.5 and D.4.3, so they have also been removed and replaced as follows:

D.2.5 Volatile Organic Compounds (VOC) ~~[326 IAC 8-1-4]~~[326 IAC 8-1-2]

- (a) Compliance with the VOC ~~content and usage~~ limitations contained in Condition D.2.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)~~ by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and VCAPC, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in ~~326 IAC 8-1-4~~. **by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.**
- (b) **Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 1, Unit 2, Unit 3, and Unit 4) to achieve compliance with conditions D.2.1 and D.2.2.**

D.3.6 Volatile Organic Compounds (VOC) ~~[326 IAC 8-1-4]~~[326 IAC 8-1-2]

- (a) Compliance with the VOC ~~content and usage~~ limitations contained in Conditions D.3.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)~~ by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and VCAPC, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in ~~326 IAC 8-1-4~~. **by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to**

each press.

- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the ganged catalytic oxidizer system (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11 and Unit 12) to achieve compliance with conditions D.3.1 and D.3.2.

D.4.3 Volatile Organic Compounds (VOC) [~~326 IAC 8-1-4~~][326 IAC 8-1-2]

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)~~ by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. ~~IDEM, OAQ and VCAPC, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~ **by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press.**

Comment 13:

Page 33. Condition D.2.6 The first sentence of the condition states: "The catalytic oxidation systems (Unit 1, Unit 2, Unit 3, and Unit 4) shall be in use any time the printing presses are in operation."

Comment: Because of the oxidizer ganging arrangement as identified in condition D.2.7, not all oxidizers are necessarily operating depending on load requirements. Condition D.2.6 would seem to conflict with Condition D.2.7 which better defines the necessary operating requirements. The intent of Condition D.2.6 is already covered under Condition C.5, which better correlates to Condition D.2.7. The above mention requirement of Condition D.2.6 should be deleted or at least altered to say "The ganged catalytic oxidation system shall be in use any time the printing presses are in operation per Condition D. 2.7".

Comment 14:

Page 33. Condition D.2.6 The second sentence of the condition sets out a minimum catalyst bed inlet temperature of 550 degrees F to ensure minimum destruction efficiency.

Comment: The temperature in the permit was based on the suggested temperature in the original construction permit application. Set point temperatures contained in permit applications are only projections based on manufacturer's best engineering judgment. The actual temperature required to meet the required destruction efficiency must be established through testing. In EPA's draft Technical Support Document for Title V permitting of Printing Facilities issued on November 22, 2002, EPA recommends keeping fixed temperature set points out of the permit. It is recommended that the permit be modified such that the minimum oxidizer set point temperature be set at the temperature for which the oxidizer last certified compliance.

Response to Comments 13 and 14:

The minimum temperature levels have been set in order to ensure proper operation of the control equipment, and initially the best available information is the manufacturer's specifications. IDEM and VCAPC believe this initial temperature must remain specified as discussed above, however a provision is added to allow for that parameter to be altered based on compliance testing. Additionally, the condition has been updated to the latest temperature monitoring language IDEM and VCAPC have developed. Condition D.2.6 has been updated as follows:

D.2.6 ~~VOC Control~~ **Catalytic Oxidizer Requirements**

~~The catalytic oxidation systems (Unit 1, Unit 2, Unit 3, and Unit 4) shall be in use any time the printing presses are in operation. When operating, the catalytic oxidizer shall maintain a minimum catalyst bed inlet temperature of 550 °F, in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the oxidizer temperature shall be maintained.~~

- (a) **A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 1, Unit 2, Unit 3, and Unit 4) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**
- (b) **The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.2.1. and D.2.2, as approved by IDEM and VCAPC.**
- (c) **On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

Since the condition now contains a provision for changing the minimum temperature, Bemis can request the value in the issued Permit be adjusted (based on that testing) with only an Administrative Amendment.

Comment 15:

Page 33. Condition D.2.7 (d) The first sentence of the condition states: "In the event that an oxidizer fails, for any reason, the presses that the oxidizer was handling shall immediately be shut down."

Comment: The following should be added to the condition: "or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted presses." The second sentence should then be altered to read: "Presses shut down in this fashion can be restarted as soon as..."

Response to Comment 15:

Condition D.2.7(d) has been changed as follows:

In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down **or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es).** ~~They~~ **Any press shut down in this fashion** can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.

Comment 16:

Page 33. Condition D.2.8 Monitoring Refers to quarterly inspections of the capture systems.

Comment: Request that the frequency be changed to semi annual inspections as stated earlier concerning Condition C.18 .

Response to Comment 16:

See Response to Comments 9 and 10. The capture system integrity is vital to the various PSD avoidance limitations specified in Condition D.2.2. OAQ and VCAPC feel this system needs to be checked at least quarterly to ensure compliance with those input limits also provides for compliance with the provisions of 326 IAC 2-2. Therefore, this requirement has not been changed.

Comment 17:

Page 34. Condition D.2.9 (a)(2)(A) The condition states: "Records shall include purchase orders, invoices, and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used".

Comment: Purchase orders and invoices are commonly unreliable for purposes of VOC tracking. We typically receive reports from the suppliers specific to VOC reporting. It is suggested that the condition be amended to read: "Records shall include Material Safety Data Sheets (MSDS) and other data sufficient to verify the type and amount used."

Response to Comment 17:

The purchase orders and invoices are options for record keeping. The source is not required to choose this option. The condition has been revised to allow for the use of other reliable data that would be more appropriate for this record keeping. Condition D.2.9(a)(2)(A) has been changed as follows:

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or any other available records sufficient necessary to verify the type and amount used.

Comment 18:

Page 34. Condition D.2.9 (a)(3) The condition requests collection of the "volume weighted" VOC content of the coatings.

Comment: Volume weighted is a contradictory term that leads to confusion in implementation. It is suggested that the term "volume" be deleted.

Response to Comment 18:

Bemis has historically used weights of material to determine emissions. Therefore the change has been made as requested. Additionally, the condition has been cleaned up to eliminate redundant requirements. Condition D.2.9(a) now reads:

To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through ~~(4)~~ ~~(6)~~ below. Records maintained for (1) through ~~(4)~~ ~~(6)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent, ~~less water~~, used for each press **monthly**.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or any other available records sufficient to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- ~~(3) The volume weighted VOC content of the coatings used for each month;~~
- ~~(4) The cleanup solvent usage for each month;~~
- ~~(5)~~**(3)** The total VOC usage for each month; and
- ~~(6)~~**(4)** The weight of VOCs emitted for each compliance period (by press) **using methods identified in conditions D.2.1 and D.2.5.**

Identical changes were made in Conditions D.3.10(a) and D.4.4(a) for the same reasons.

Comment 19:

Page 34. Condition D.2.10 See comment to condition C.18 (a) & (d).

Response to Comment 19:

See Response to Comment 4. IDEM and VCAPC have authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ and VCAPC believe that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance and thirty (30) days of the end of the reporting period is appropriate for submitting. Additionally, Bemis is already preparing these reports quarterly. Therefore no changes have been made as a result of this comment.

Comment 20:

Page 36. Condition D.3.1 Discusses the possibility that presses 23, 24, 25, & 26 may be subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration)

Comment: See comment to Condition D.2.1

Response to Comment 20:

This language was based upon actual emission data provided to IDEM and VCAPC by Bemis. This data shows actual emissions above the PSD Significant levels. Specifically for Presses #23, #24, and #25 identified in Condition D.3.1, the limitation set forth in the CP (including netting) was not sufficient to limit emissions below the 40 tpy VOC significance level because in line printer E31 (which was constructed and operated without a permit) was not included in the analysis. The permit shield can not be in effect in any circumstance where the existing limits do not ensure compliance with the applicable requirements. However, if further review shows this determination is not correct, and Bemis is in compliance with all applicable requirements then the Permit will be modified to reinstate the Permit Shield. Therefore, no change has been made to Condition D.3.1 as a result of this comment.

Comment 21:

Page 36 & 37. Conditions D.3.2 (a), (b), (c), (d), (e), (f) & (g) See comments to Conditions D.2.2 (a), (b) & (c).

Comment 22:

Page 37. Conditions D.3.3 (a) & (c) See comments to Condition D.2.2 (a) & (b) with overall control of 80.75%.

Response to Comments 21 and 22:

See Response to Comments 9 and 10. It is acceptable to convert the calculated VOC input limits to VOC emission based limits. It is also acceptable to convert the individual capture efficiency and control efficiency limits into a combined overall control efficiency, so long as the minimum capture and control requirements from 326 IAC 8-5-5 are still met. First, Condition D.3.3 has been modified to remove the extra efficiency limitations. It now reads:

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) **Pursuant to 326 IAC 8-5-5(e)(3)**, the VOC capture systems on the seven (7) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, and Press #25 and Press #36), in combination with the catalytic oxidation systems, shall be operated in such a manner to attain and maintain a minimum of 85% VOC capture efficiency. This condition, in combination with (c) below, will also satisfy the requirements of 326 IAC 8-5-5 (graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.
- (b) **Pursuant to 326 IAC 8-5-5(e)(3)**, the VOC capture systems on the nine (9) printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press

#32, Press #33, Press #34 and Press #35), **in combination with the catalytic oxidation systems**, shall be operated in such a manner to attain and maintain a minimum of 100% VOC capture efficiency. ~~This condition, in combination with (c) below, will also satisfy the requirements of 326 IAC 8-5-5 (graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.~~

- (c) **Pursuant to 326 IAC 8-5-5(c)(3)(B)**, the eight (8) catalytic oxidizers (Unit 5, Unit 6, Unit 7, Unit 8, Unit 9, Unit 10, Unit 11, and Unit 12) shall maintain a minimum destruction efficiency of **90% 95%**. ~~This condition will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires either a minimum destruction efficiency of 90% or solvent content limitations.~~

The overall control limitation required to make the requirements of 326 IAC 2-2 (PSD) not applicable, has been added to a re-organized Condition D.3.2. The minimum overall control efficiencies were determined by combining the previously specified capture and control requirements (example: 85% capture and 95% destruction is equal to 80.75% overall control because 15% is never captured and 4.25% was captured but not destroyed; $100\% - 15\% - 4.25\% = 80.75\%$) to make the requirements of PSD not applicable. Condition D.3.2 now reads:

D.3.2 Volatile Organic Compounds (VOC) Use [326 IAC 2-2][40 CFR 52.21]

- (a) Pursuant to Construction Permit CP-84-1896, issued on November 10, 1990, **and revised through this Part 70 permit, the following conditions apply:**
- (1) The **annual** VOC input to Press #19 and Press #20 combined shall be limited **such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 39.9 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 207 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 39.9 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #19 and Press #20.**
- (b) Pursuant to Construction Permit CP-167-2146, issued October 22, 1991, **and revised through this Part 70 permit, the following conditions apply:**
- (1) The **annual** VOC input to Press #21 and Press #22 combined shall be limited **such that the potential to emit does not exceed 39.9 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 39.9 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 207 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 39.9 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #21 and Press #22.**
- (c) Pursuant to Construction Permit CP-167-3392-00033, issued on April 11, 1994, **and revised through this Part 70 permit, the following conditions apply:**

- (1) The **annual** VOC input to Press #23, Press #24, and Press #25 combined shall be limited **such that the potential to emit does not exceed 74.1 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 74.1 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 385.05 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 74.1 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #23, Press #24 and Press #25.**
- (d) Pursuant to Construction Permit CP-167-V014-00033, issued on May 30, 1997, **and revised through this Part 70 permit, the following conditions apply:**
 - (1) The **annual** VOC input to Press #27, Press #28, Press #29, and Press #30 combined shall be limited **such that the potential to emit does not exceed 38.8 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 38.8 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 773 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 38.8 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #27, Press #28, Press #29 and Press #30.**
- (e) Pursuant to Significant Source Modification 167-11568-00033, issued on February 1, 2000, **and revised through this Part 70 permit, the following conditions apply:**
 - (1) The **annual** VOC input to Press #31 and Press #32 combined shall be limited **such that the potential to emit does not exceed 19.32 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - overall control efficiency) # 19.32 tons. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 386.5 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 19.32 tons per year.**
 - (2) **The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #31 and Press #32.**
- (f) Pursuant to SSM 167-12790-00033, issued on January 23, 2001, **and revised through this Part 70 permit, the following conditions apply:**
 - (1) The **annual** VOC input to Press #34 and Press #35 combined shall be

- limited such that the potential to emit does not exceed 16.85 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 16.85 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 337.31 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 16.85 tons per year.
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #34 and Press #35.
- (g) Pursuant to SSM 167-16521-00033, issued on April 10, 2003, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #33 shall be limited such that the potential to emit does not exceed 9.72 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 9.72 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and to less than 193.25 tons per 12 consecutive month period with compliance demonstrated at the end of each month. With the minimum emission capture and control requirements listed in Condition D.3.3 below, this limitation is equivalent to an emission limit of 9.72 tons per year.
- (2) The Permittee shall maintain a minimum overall control efficiency of 95% for VOC emissions from Press #33.
- (h) Pursuant to SSM 167-18122-00033, issued on May 3, 2004, and revised through this Part 70 permit, the following conditions apply:
- (1) The annual VOC input to Press #36 shall be limited such that the potential to emit does not exceed 39.99 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - \text{overall control efficiency}) \# 39.99 \text{ tons}$. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable; and
- (2) The Permittee shall maintain a minimum overall control efficiency of 80.75% for VOC emissions from Press #36.

As a result of these changes the appropriate reporting forms were updated as well.

Comment 23:

Page 38. Condition D.3.5 (a) See comments to Condition D.2.4 (a).

Response to Comment 23:

See Response to Comment 11. IDEM, OAQ and VCAPC feel the capture and control systems are necessary in order to comply with the provisions established in D.3.2 and D.3.3. If either of these systems is not functioning properly the actual emission rates would be significantly increased. Even though major problems can be identified by inspections or operational problems, minor problems such as broken gaskets, seals, or other items could be overlooked. These minor problems could reduce the capture effectiveness. As a result, periodic testing and verification of system integrity are necessary parts

of this Part 70 Permit. An error in the prior application of the testing frequency was found as a result of the review to respond to this comment. An error in interpretation was made regarding "identical units". Based on this error IDEM and VCAPC allowed only 2 of 8 presses to be required to test. However, printing presses are not considered identical units. Printing press emissions are very job dependant. They have variable solvent loading, line speed, and print width (to name a few parameters). Therefore, the testing requirements have been changed to require each unit be tested once every 2.5 years. Under 326 IAC 2-7-5 and 2-7-6, IDEM and VCAPC have the authority to establish testing requirements sufficient to assure compliance with the terms and conditions of this permit. This frequency (once per 2.5 years) is required because each of these presses have potential emissions greater than 100 tpy VOC before control. Condition D.3.5 now reads:

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.3.2 and D.3.3**, the Permittee shall perform VOC capture efficiency tests on **each two (2)** of these printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, and Press #25) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.3.2 and D.3.3**, the Permittee shall perform VOC capture efficiency tests on **each two (2)** of these printing presses (Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, and Press #35) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.
- (c) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform VOC capture efficiency tests on Press #36 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.**
- ~~(e)~~(d) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.3.2 and D.3.3**, the Permittee shall perform VOC destruction efficiency tests on **each one (1)** of these catalytic oxidizers (Unit 5 and Unit 6) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.
- ~~(d)~~(e) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.3.2 and D.3.3**, the Permittee shall perform VOC destruction efficiency tests on **each one (1)** of these catalytic oxidizers (Unit 7 and Unit 8) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration Testing shall be conducted in accordance with Section C- Performance Testing.
- (e)(f) Within the first thirty (30) months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions **D.3.2 and D.3.3**, the Permittee shall perform VOC destruction efficiency tests on **each one (1)** of these catalytic oxidizers (Unit 9, Unit 10, Unit 11 and Unit 12) utilizing methods as approved by

the Commissioner. This test shall be repeated at least once every two and a half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 24:

Page 38. Condition D.3.6 (b) The condition sets out periodic capture efficiency testing requirements for presses 27 through 35.

Comments: Each of these presses employs the use of a permanent total enclosure. In order to demonstrate that a capture system meets the requirements for a permanent total enclosure one must use USEPA Method 204. This method utilizes a demonstration technique rather than a test approach. It is suggested that this be clarified in the permit.

Response to Comment 24:

USEPA Method 204 is considered by IDEM and EPA to be a test method. Therefore, the current wording requiring "... utilizing methods as approved by the Commissioner." already covers this situation. Therefore, no change was made as a result of this comment.

Comment 25:

Pages 38 & 39. Conditions D.3.7 (a), (b) & (c) See comments to the first sentence of Condition D.2.6.

Comment 26:

Pages 38 & 39. Conditions D.3.7 (a), (b) & (c) See comments to the second sentence of Condition D.2.7.

Response to Comments 25 and 26:

See Response to Comment 14. The minimum temperature levels have been set in order to ensure proper operation of the control equipment, and initially the best available information is the manufacturer's specifications. IDEM and VCAPC believe this initial temperature must remain specified as discussed above, however a provision is added to allow for that parameter to be altered based on compliance testing. Additionally, the condition has been updated to the latest temperature monitoring language IDEM and VCAPC have developed. Condition D.3.7 has been updated as follows:

D.3.7 ~~VOC Control~~ Catalytic Oxidizer Requirements

- (a) ~~The catalytic oxidation systems (Unit 5 and Unit 6) shall be in use any time the printing presses are in operation. When operating, the catalytic oxidizer shall maintain a minimum catalyst bed inlet temperature of 550 °F, in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the oxidizer temperature shall be maintained. The Permittee shall monitor Unit 5 and Unit 6 according to the following:~~
- (1) **A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 5 and Unit 6) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 550°F. A three (3) hour average temperature that is below 550°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

- (c) ~~The catalytic oxidation system (Unit 9, Unit 10, Unit 11, and Unit 12) shall be in use any time the printing presses are in operation. When operating, the catalytic oxidizer shall maintain a minimum catalyst bed inlet temperature of 500 °F, in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the oxidizer temperature shall be maintained. The Permittee shall monitor Unit 9, Unit 10, Unit 11 and Unit 12 according to the following:~~
- (1) **A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer (Unit 9, Unit 10, Unit 11 and Unit 12) for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of any catalytic oxidizer is below 500°F. A three (3) hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**
 - (2) **The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.2. and D.3.3, as approved by IDEM and VCAPC.**
 - (3) **On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of and catalytic oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

Since the condition now contains a provision for changing the minimum temperature, Bemis can request the value in the issued Permit be adjusted (based on that testing) with only an Administrative Amendment.

Comment 27:

Page 39. Conditions D.3.8 (d) See comments to the second sentence of Condition D.2.7 (d).

Response to Comment 27:

See Response to Comment 15. Condition D.3.8(d) has been changed as follows:

In the event that an oxidizer fails, for any reason, the presses that oxidizer was handling shall immediately be shut down **or diverted to an operating oxidizer with sufficient capacity to accommodate the diverted press(es)**. ~~They~~ **Any press shut down in this fashion** can be restarted as soon as additional oxidation capacity is brought online or by shutting other presses down.

Comment 28:

Page 39. Conditions D.3.10 (a)(2)(A) See comments to Condition D.2.9 (a)(2)(A).

Response to Comment 28:

See Response to Comment 17. The purchase orders and invoices are options for record keeping. The source is not required to choose this option. The condition has been revised to allow for the use of other reliable data that would be more appropriate for this record keeping. Condition D.3.9(a)(2)(A) has been changed as follows:

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or any other available records sufficient ~~necessary~~ to verify the type and amount used.

Comment 29:

Page 40. Conditions D.3.10 (a)(3) See comments to Condition D.2.9(a)(3).

Response to Comment 29:

See Response to Comment 18.

Comment 30:

Page 40. Condition D.3.11 See comment to condition C.18 (a) & (d).

Response to Comment 30:

See Response to Comment 5. IDEM and VCAPC have authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ and VCAPC believe that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance and thirty (30) days of the end of the reporting period is appropriate for submitting. Additionally, Bemis is already preparing these reports quarterly. Therefore no changes have been made as a result of this comment.

Comment 31:

Page 42. Condition D.4.2 See comment to Condition D.2.1.

Response to Comment 31:

See Response to Comment 8. This language was based upon actual emission data provided to IDEM and VCAPC by Bemis. This data shows actual emissions above the PSD Significant levels. Specifically for these in line printers identified in Condition D.4.2. Bemis installed all these units without prior review or approval. The permit shield can not be in effect in any circumstance where the existing limits do not ensure compliance with the applicable requirements. However, if further review shows this determination in not correct, and Bemis is in compliance with all applicable requirements then the Permit will be modified to reinstate the Permit Shield. As a clarification the following has been added to Condition D.4.1(a).

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (E5, E15, E17, E18, E19, E22, E23, and E31) with regard to 326 IAC 2-2 (PSD).

Comment 32:

Page 42. Condition D.4.4 See comment to Condition D.2.6.

Response to Comment 32:

See Response to Comment 12.

Comment 33:

Page 42. Conditions D.4.4 (a)(2)(A) See comments to Condition D.2.9 (a)(2)(A).

Response to Comment 33:

See Response to Comment 17. The purchase orders and invoices are options for record keeping. The source is not required to choose this option. The condition has been revised to allow for the use of other reliable data that would be more appropriate for this record keeping. Condition D.4.4(a)(2)(A) has been changed as follows:

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or any other available records sufficient necessary to verify the type and amount used.

Comment 34:

Page 42. Conditions D.4.5 (a)(3) See comments to Condition D.2.10 (a)(3).

Response to Comment 34:

See Response to Comment 18.

Comment 35:

Page 42. Condition D.4.5 See comment to condition C.18 (a) & (d).

Response to Comment 35:

See Response to Comment 5. IDEM and VCAPC have authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ and VCAPC believe that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance and thirty (30) days of the end of the reporting period is appropriate for submitting. Additionally, Bemis is already preparing these reports quarterly. Therefore no changes have been made as a result of this comment.

Comment 36:

Page 43. Condition D.5 See comments to Item 34 on page 7 of the draft permit.

Response to Comment 36:

This change was made as requested (see Response to Comment 3).

Comment 37:

Pages 49 thru 63. See comments to Condition C.18 (a).

Response to Comment 37:

See Response to Comment 5. IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ and VCAPC believe that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance and thirty (30) days of the end of the reporting period is appropriate for submitting. Additionally, Bemis is already preparing these reports quarterly. Therefore no changes have been made as a result of this comment.

Comment 38:

Pages 49 thru 57 & 60 See comments to Condition D.2.2 (a), (b) & (c).

Response to Comment 38:

See Response to Comments 9 and 10 as well as Response to Comments 21 and 22. The reporting forms were updated to match the emission based limits.

Comment 39:

Page 61

See comments to Condition D.2.7.

Response to Comment 39:

See Response to Comment 14. The minimum temperature levels have been set in order to ensure proper operation of the control equipment, and initially the best available information is the manufacturer's specifications. IDEM and VCAPC believe this initial temperature must remain specified as discussed above, however a provision is added to allow for that parameter to be altered based on compliance testing. A statement has been added to the reporting form indicating that the most recent passed stack test temperature is acceptable. You will also have to attach documentation demonstrating compliance with the destruction efficiency requirement (such as the stack test summary). The changes in minimum catalytic oxidizer inlet temperature were previously identified in Response to Comment 14 and Response to Comment 26. The report form itself was not modified.

Comment 40:

(TSD) Page 3 Item 34

See comments to Item 34 on page 7 of the draft permit.

Response to Comment 40:

The descriptive change was noted (see Response to Comment 3). The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 41:

(TSD) Pages 3 & 4 Items 36 – 47

See comments to Condition D.2.7.

Response to Comment 41:

See Response to Comment 14. The same resolution as Comment 14 is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 42:

(TSD) Page 7 Item 24 (A) "Occasional hand wiping...using 1,1,1, trichloroethane,..." was discontinued years ago and we request this reference be removed.

Response to Comment 42:

The change is noted here. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 43:

(TSD) Page 8 Enforcement Issue See comments to Condition D.2.1. The word "Enforcement" tends to imply guilt and we request this section be worded more appropriately. Also, item (a) of this section refers to a condition in the TSD entitled *Unpermitted Emission Units and Pollution Control Equipment*, which is not found within the TSD.

Response to Comment 43:

See Response to Comment 8. This language was based upon actual emission data provided to IDEM and VCAPC by Bemis. It is considered a violation because actual emission data supplied by Bemis shows they exceeded prior permit limits and PSD thresholds. The term Enforcement is appropriate in this

case since that is the specific division of IDEM to which this issue will be referred. IDEM and VCAPC have changed how this is stated in the Part 70 Permit. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, no change has been made as a result of this comment.

Comment 44:

(TSD) Page 14 County Attainment Status. The word "attainment" is misspelled for ozone within the chart.

Response to Comment 44:

The typographic error is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 45:

(TSD) Page 26 326 IAC 8-1-6 (c) . Third line of the paragraph should read "The PTE of each press is (not ifs) equivalent to..."

Response to Comment 45:

The typographic error is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 46:

(TSD) Page 28 Oxidizer Ganging. The first sentence should read "Bemis Company has 2 different sets (not set) of oxidizers..."

Response to Comment 46:

The typographic error is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 47:

(TSD) Page 29 Paragraph before Testing RequirementsThe last sentence should read "These requirements are in place...adequately controlled at (not are) any given time..."

Response to Comment 47:

The typographic error is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 48:

(TSD) Page 29 Testing Requirements. The first sentence should read "Bemis Company, Inc operates 25 (not 24) printing presses..."

Response to Comment 48:

After the removal of Press #26 (see Comment 1 of the October 6, 2003 Comments) the number of presses is now correct. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 49:

(TSD) Page 29 Testing Requirements See comments to Condition D.2.5 (a).

Response to Comment 49:

See Response to Comment 11. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 50:

(TSD) Page 30 Item 1. (bullet) See comments to Condition D.2.5 (a).

Response to Comment 50:

See Response to Comment 11. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 51:

(TSD) Page 30 Item 2. (bullet) See comments to Condition D.2.7.

Response to Comment 51:

See Response to Comment 14. The same resolution as Comment 14 is noted. The OAQ and VCAPC prefer the technical support document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 52:

Bemis Company requested a group of description changes.

Response to Comment 52:

These changes affect Condition A.2 and the respective D Sections. Those descriptions have been updated as follows:

- (1) Flexographic printing press (~~PCMC~~), identified as press #1, installed in 1980, using no control, and exhausting to stack 201.
- (2) Flexographic printing press (~~PCMC~~), identified as press #2, installed in 1970, using no control, and exhausting to stack 202.

- (3) Flexographic printing press (~~PCMC~~), identified as press #6, installed in 1969, using no control, and exhausting to stack 206.
- (4) Flexographic printing press (~~PCMC~~), identified as press #7, installed in 1974, using no control, and exhausting to stack 207.
- (5) Flexographic printing press (~~PCMC~~), identified as press #8, installed in 1974, using no control, and exhausting to stack 208.
- (6) Flexographic printing press (~~PCMC~~), identified as press #9, installed in 1973, using no control, and exhausting to stack 209.
- (7) Flexographic printing press (~~PCMC~~), identified as press #10, installed in 1980, using no control, and exhausting to stack 210.
- (8) Flexographic printing press (~~PCMC~~), identified as press #11, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (9) Flexographic printing press (~~PCMC~~), identified as press #12, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (10) Flexographic printing press (~~PCMC~~), identified as press #13, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (11) Flexographic printing press (~~PCMC~~), identified as press #14, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (12) Flexographic printing press (~~PCMC~~), identified as press #15, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (13) Flexographic printing press (~~PCMC~~), identified as press #16, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (14) Flexographic printing press (~~PCMC~~), identified as press #17, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (15) Flexographic printing press (~~PCMC~~), identified as press #18, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily~~ to stacks **1, 2, 3, and/or 4.**
- (16) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #19, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily to stack 5:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (17) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #20, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily to stack 5:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (18) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #21, using ~~reverse angle doctor blades and~~ catalytic oxidation for control, and exhausting ~~primarily to stack 6:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**

- (19) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #22, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 6:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (20) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #23, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 7:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (21) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #24, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 7:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (22) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #25, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 8:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (23) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #27, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 9:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (24) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #28, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 9:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (25) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #29, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 10:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (26) Flexographic printing press (~~Windmoeller & Hoelscher~~), identified as press #30, using ~~reverse angle doctor blades and catalytic oxidation for control, and exhausting primarily to stack 10:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (27) ~~Windmoeller & Hoelscher Astraflex eight color F~~flexographic printing press, identified as Press 31, using catalytic oxidation as control, and ~~primarily exhausting to stack 11:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (28) ~~Windmoeller & Hoelscher Astraflex eight color F~~flexographic printing press, identified as Press 32, using catalytic oxidation as control, and ~~primarily exhausting to stack 11:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (29) ~~Windmoeller & Hoelscher Astraflex eight color F~~flexographic printing press, identified as Press 33, using catalytic oxidation as control, and exhausting to ~~ganged oxidizers. (Under construction, permitted in 2003)~~ **stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (30) ~~Windmoeller & Hoelscher Olympia six color F~~flexographic printing press, identified as Press 34, using catalytic oxidation as control, and ~~primarily exhausting to stack 12:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (31) ~~Windmoeller & Hoelscher Olympia six color F~~flexographic printing press, identified as Press 35, using catalytic oxidation as control, and ~~primarily exhausting to stack 12:~~ **to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**
- (32) ~~One color, 2-side F~~flexographic in-line printer attached to extruder #11, identified as E-11, using no control, and primarily exhausting to stack 111.
- (33) **Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.**

- (34) Closed Solvent Spray type parts washer ~~using a reclaim solvent mixture, with an internal volume of 5 cubic meters, with the closed system for control, and~~ exhausting to stack 20.
- (35) Cyrel plate making facility exhausting to stack 23.
- (36) Catalytic Oxidizer (~~Tec System~~), identified as I1, with a maximum air flow rate of 7000 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #11 and #12 **through #18**, and exhausting to stack 1.
- (37) Catalytic Oxidizer (~~Tec System~~), identified as I2, with a maximum air flow rate of 7000 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #13 and #14 **#11 through #18**, and exhausting to stack 2.
- (38) Catalytic Oxidizer (~~Tec System~~), identified as I3, with a maximum air flow rate of 7000 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #15 and #16 **#11 through #18**, and exhausting to stack 3.
- (39) Catalytic Oxidizer (~~Tec System~~), identified as I4, with a maximum air flow rate of 7000 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 3.0 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #17 and #18 **#11 through #18**, and exhausting to stack 4.
- (40) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I5, with a maximum air flow rate of 8500 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #19 and #20 **#19 through #25 and #27 through #35**, and exhausting to stack 5.
- (41) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I6, with a maximum air flow rate of 8500 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #21 and #22 **#19 through #25 and #27 through #35**, and exhausting to stack 6.
- (42) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I7, with a maximum air flow rate of 8500 CFM, ~~minimum inlet bed temperature of 650°F,~~ and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #23 and #24 **#19 through #25 and #27 through #35**, and exhausting to stack 7.
- (43) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I8, with a maximum air flow rate of 8500 CFM, ~~minimum inlet bed temperature of 650°F,~~ and a maximum heat input rating of 2.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #25 and #26 **#19 through #25 and #27 through #35**, and exhausting to stack 8.
- (44) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I9, with a maximum air flow rate of 12750 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #27 and #28 **#19 through #25 and #27 through #35**, and exhausting to stack 9.
- (45) Catalytic Oxidizer (~~Dec-E-Tec~~), identified as I10, with a maximum air flow rate of 12750 CFM, ~~minimum inlet bed temperature of 550°F,~~ and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, **primarily capable of** controlling presses #29 and #30 **#19 through #25 and #27 through #35**, and exhausting to stack 10.
- (46) Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Oxidizer, identified as Unit 11 (or I-11), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour

- (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 °F, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack 11. **Catalytic Oxidizer, identified as I11, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 11.**
- (47) ~~Dec-E-Tec model CI-Eagle 12,750-HT HE-65 Catalytic Oxidizer, identified as Unit 12 (or 12), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 °F, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack 12.~~ **Catalytic Oxidizer, identified as I12, with a maximum air flow rate of 12750 CFM, and a maximum heat input rating of 4.5 million BTU per hour for the supplemental fuel, capable of controlling presses #19 through #25 and #27 through #35, and exhausting to stack 12.**
- (48) Flexographic in-line portable printer (~~Flex-O-Line~~) attached to extruder #2, identified as E2, installed in 1979, using no control, and exhausting to stack 102.
- (49) Flexographic in-line portable printer (~~Advance~~) attached to extruder #5, identified as E5, installed in 1988, using no control, and exhausting to stack 105.
- (50) Flexographic in-line portable printer (~~Gloucester~~) attached to extruder #12, identified as E12, installed in 1979, using no control, and exhausting to stack 112.
- (51) Flexographic in-line portable printer (~~Gloucester~~) attached to extruder #13, identified as E13, installed in 1979, using no control, and exhausting to stack 113.
- (52) Flexographic in-line portable printer (~~Advance~~) attached to extruder #15, identified as E15, installed in 1988, using no control, and exhausting to stack 115.
- (53) Flexographic in-line portable printer (~~Flex-O-Line~~) attached to extruder #17, identified as E17, installed in 1986, using no control, and exhausting to stack 117.
- (54) Flexographic in-line portable printer (~~Flex-O-Line~~) attached to extruder #18, identified as E18, installed in 1986, using no control, and exhausting to stack 118.
- (55) Flexographic in-line portable printer (~~Advance~~) attached to extruder #19, identified as E19, installed in 1988, using no control, and exhausting to stack 119.
- (56) Flexographic in-line portable printer (~~Windmoeller & Hoelscher~~) attached to extruder #20, identified as E20, installed in 1980, using no control, and exhausting to stack 120.
- (57) Flexographic in-line portable printer (~~MAF-Italian~~) attached to extruder #22, identified as E22, installed in 1986, using no control, and exhausting to stack 122.
- (58) Flexographic in-line portable printer (~~MAF-Italian~~) attached to extruder #23, identified as E23, installed in 1986, using no control, and exhausting to stack 123.
- (59) Flexographic in-line portable printer (~~Gloucester~~) attached to extruder #31, identified as E31, installed in 1990, using no control, and exhausting to stack 131.
- (60) Storage tank for reclaim solvent blend (~~Modern Welding~~), identified as T1, capacity of 10,000 gallons, exhausting to stack 241.
- (61) Storage tank for slow solvent blend (~~Modern Welding~~), identified as T2, capacity of 10,000 gallons, exhausting to stack 242.

- (62) Storage tank for fast solvent blend (~~Modern Welding~~), identified as T3, capacity of 10,000 gallons, exhausting to stack 243.
- (63) Storage tank for hazardous waste storage of ink (~~Modern Welding~~), identified as T4, capacity of 6,000 gallons, exhausting to stack 244.
- (64) Storage tank for reclaim solvent blend (~~Modern Welding~~), identified as T5, capacity of 10,000 gallons, exhausting to stack 245.
- (65) Storage tank for slow solvent blend (~~Modern Welding~~), identified as T6, capacity of 10,000 gallons, exhausting to stack 246.
- (66) Storage tank for fast solvent blend (~~Modern Welding~~), identified as T7, capacity of 10,000 gallons, exhausting to stack 247.
- (67) Storage tank for hazardous waste storage of ink (~~Modern Welding~~), identified as T8, capacity of 6,000 gallons, exhausting to stack 248.

Upon further review, IDEM and VCAPC have determined the following clarifications are appropriate.

Condition C.14 (b)(3) has been modified to only require notification in situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ and VCAPC an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. Condition C.14 (b)(3) has been changed as follows:

If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then** the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

There was a missing rule citation from Condition B.21. The title of that condition now reads:

B.21 Source Modification Requirement [326 IAC 2-7-10.5][**IC 13-17-3-2**]

A clarification was made to Condition C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports, under (b)(3). Condition C.14(b)(3) now reads:

If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

Conditions referencing the "source" have been changed to the "Permittee". Specifically, C.7(c), C.13 and C.18(a) have been changed as follows:

C.7(c)

Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the **Permittee source** submits to IDEM, OAQ and VCAPC, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.13

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

C.18(a)

The **Permittee source** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Because of the enforcement referral on Presses #17 and #18, the following statement has been added to Condition D.2.1(c):

The Permit Shield provided by Condition B.13 of this permit does not apply to these emission units (Presses #17 and #18) with regard to 326 IAC 2-2 (PSD).

On May 3, 2004 Significant Source Modification 167-18122-00033 was issued for operation of Press #36. Construction had been previously approved by Interim Approval I167-18122-00033. The requirements of SSM 167-18122-00033 have been incorporated into Section D.3 of this Part 70 using the current Part 70 format on each condition. The description of Press #36 that appears in Condition A.2 and Section D.3 is as follows: (see Response to Comment 52)

Flexographic printing press, identified as Press 36, using catalytic oxidation as control, and exhausting to stacks 5, 6, 7, 8, 9, 10, 11, and/or 12.

Press #36 was added to Condition D.3.3(a) and the VOC limitations were added as Condition D.3.2(h). See Response to Comments 21 and 22:

The testing requirements for Press #36 were added in as Condition D.3.5(c) with the rest of the condition being renumbered. See Response to Comment 23.

Conditions D.3.8(a) and (b) were modified to include Press #36 as follows:

- (a) Before any of the affected presses (Presses #19 through #25 and #27 through **#35 #36**) can operate, one oxidizer shall be warmed up, and operational;
- (b) Presses #19 through #25 are each rated at 4250 acfm. Presses #27 through #35 are each rated at 6375 acfm. **Press #36 is rated at 4000 acfm.** The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the oxidizers that are in operation at any time.

Condition D.3.9(a) was modified to include Press #36 as follows:

- (a) The Permittee shall conduct quarterly inspections of all components relating to the capture system of each of the sixteen (16) printing presses (Press #19, Press #20, Press #21, Press #22, Press #23, Press #24, Press #25, Press #27, Press #28, Press #29, Press #30, Press #31, Press #32, Press #33, Press #34, **and Press #35, and Press #36**). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) names 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Vigo County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

The Permittee owns and operates a stationary polyethylene film plant including film production, printing, and converting operations.

Responsible Official: Plant Manager
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47805
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
General Source Phone Number: (812) 466-2213
SIC Code: 2673, 3081, and 3079
County Location: Vigo County
Source Location Status: Maintenance Attainment for Sulfur Dioxide (SO₂)
Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, under Nonattainment NSR
Not 1 of 28 Source Categories

The state has initiated a rulemaking to adopt the federal 8-hour ozone nonattainment designation into 326 IAC 1-4. The applicability of the state nonattainment NSR program, 326 IAC 2-3 (Emission Offset), relies on the attainment designations in 326 IAC 1-4. Until the state rule has been updated, IDEM and VCAPC will rely on 326 IAC 2-1.1-5(a)(1) to apply minor limits to remain below the nonattainment NSR thresholds. 326 IAC 2-1.1-5(a)(1) clarifies that IDEM and VCAPC can not issue a permit or modification that will cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). Vigo County has been designated as nonattainment for the 8-hour ozone standard. The existing approvals were correctly reviewed with regard to the Prevention of Significant Deterioration (PSD) program, and therefore will not be changed. However, any new applications will be reviewed under the new criteria.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment

SO ₂	maintenance attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	Basic nonattainment
CO	attainment
Lead	attainment

- (a) ~~Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.~~
- (a) **Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.**

ATTACHMENT A

Replacement Conditions

In addition to the techniques mentioned in the previous White Papers, we believe that another smart permit technique is generally available which involves using replacement conditions to revise certain minor NSR permit terms into a more flexible format. All applicable requirements, including the terms and conditions of existing NSR permits issued pursuant to the State implementation plan (SIP), must be included in the title V permit. Some of the terms in previously issued minor NSR permits may severely restrict the operational choices that a source can make. Example terms are:

- (1) those that limit the volatile organic compound (VOC) content of coatings and solvents instead of limiting VOC emissions;
- (2) specify or prohibit the use of certain coatings and solvents; or
- (3) require or prohibit specific conditions, rates of production, types of inputs or products, or rate of input.

Additional flexibility might be accomplished by fashioning replacement conditions which:

- (1) retain the required emissions limit;
- (2) delete the specific restrictions on materials usage and/or production; and
- (3) add a mass balance-based formula which determines emissions replicably by interrelating the proven combined effect of any control devices and the relevant operating parameters (e.g., effects of specific materials used, production rates, and capture and control efficiencies, where relevant).

Under this approach, the source would have to maintain a log of the inputs to the relevant formulas and the resultant calculations for the relevant time periods. By not imposing limitations on individual materials usage or VOC content, significant flexibility is afforded to adjust operations, to reformulate the process materials, to reduce emissions, and to allow for possible pollution prevention and increased production.

The extent to which restrictive terms in minor NSR permits can be revised into a more flexible format depends on the specific reasons that the limitations were included. Where an NSR permit incorporates the restrictions of an applicable regulation (e.g., an NSPS or a SIP rule), revision to a more flexible format is not possible. A voluntary limit on potential-to-emit (PTE) is an example of a permit term that does not have a corresponding regulation and that is sometimes written more restrictively than necessary to ensure practical enforceability. Where not barred by a particular applicable requirement, a more flexible format (i.e., replacement conditions) may, in many cases, preserve the practical enforceability of a limit previously taken to restrict the PTE of an emissions unit.

Where compliance with underlying requirements can be assured with more flexible permit terms, you may be able to revise minor NSR permit terms into this more flexible format prior to their incorporation into the source's title V permit. You may accomplish this efficiently by using the parallel process mentioned in White Paper Number 1 to modify the minor NSR permit.

Developing replacement conditions to achieve more flexible permit terms must be consistent with guidance given in our June 13, 1989 memorandum entitled "Guidance on Limiting Potential to Emit in New Source Permitting," signed by Terrell E. Hunt, Office of Enforcement and Compliance Monitoring, and John Seitz, Office of Air Quality Planning and Standards. Accordingly, replacement conditions are available to implement the alternative to the daily emissions calculations described in the 1989 memorandum for surface coating operations where production or materials variability precludes the use of operating and production parameters. Replacement conditions also meet the need for readily verifiable and enforceable restrictions on actual emissions as outlined in the Louisiana-Pacific case, *United States v. Louisiana - Pacific Corporation*, 682 F. Supp. 1122 (D. Colo., October 30, 1987) and 682 F. Supp. 1141 (D. Colo., March 22, 1988).

ATTACHMENT B

Experience has shown that limits on production and operating parameters can be overly constraining for some VOC sources, restricting operations even when the source is well within the underlying emissions limit. For example, a permit term limiting the annual hours of operation might have been placed on a surface coating line to limit its annual VOC emissions. If this source pursues a pollution prevention alternative and switches to lower-VOC coatings, this operational limit becomes needlessly restrictive-the source could meet the underlying PTE limit even if it operated more hours per year. Thus, the source is unnecessarily limited in its ability to respond to market demand. A less constraining permit term would limit this surface coating source's VOC emissions directly.

Limits on VOC emissions typically can be made enforceable as a practical matter. The most direct method is through the use of well maintained and operated CEMS. Where reasonable to do so, we encourage the use of these systems, which provide a direct measurement of the most critical parameter-emissions themselves. Where a CEMS is not appropriate, a "formula approach" can often be used to track VOC emissions in a practical, enforceable manner. This approach involves tracking the critical production and/or operating parameters, and inputting these values into a formula to determine actual emissions from the source. The actual emissions can then be compared directly to the applicable PTE limit.

We believe that the formula approach replicably establishes a quantifiable relationship between emissions and certain production and operational parameters. For a source to qualify for the formula approach, you must determine that its emissions can be accurately and replicably determined in this way. The formula approach requires establishing in the permit an explicit relationship between material usage, material properties, capture and control system performance, and/or production data as the basis for calculating actual emissions. This approach has been utilized in some State operating permits to re-format or replace prescriptive NSR requirements. **Sources like printers that rely on a mass balance approach to determine emissions are prime candidates for using this approach.** The use of the formula approach is consistent with past EPA guidance in that it relies on appropriate tracking of production and/or operational parameters. These parameters for printers are often more easily tracked than emissions themselves. Sources that can use a conservative mass balance approach are good candidates for this approach.

To implement the formula approach, you would need to coordinate with facility personnel to develop a series of relationships that account for the emissions from the materials consumed at the facility. For example, for rotogravure presses, this might require one equation to address usage of inks, coatings, and solvents, and a second equation for the usage of cleaning materials. For lithographic presses, equations might also be needed for fountain solution additives, with separate equations for manual and blanket wash cleaning solvent use. The equations would be expected to follow essentially the same approach the facility has historically used to calculate emissions. Each facility would be required to maintain records of data used to determine each parameter established in each equation.

The formula approach must include the effect of capture systems and control devices, where these efficiencies are known and can be reliably monitored. We expect continuous parameter monitoring as an indicator of ongoing performance of these systems at the level established through performance testing. (The permit may include a replicable operating procedure (ROP) for updating the indicator value without a permit revision after subsequent testing.) In addition, where we have established values for capture or retention of VOC in the product (e.g., for lithography), these values may be integrated into the formula approach. Finally, the VOC content of waste materials can be subtracted from emissions, if this quantity is accurately determined and well documented.

As mentioned, the formula approach for a given source must be entirely nondiscretionary and replicable. That is, the formula necessarily yields a unique and repeatable outcome when the required information is input. In addition, the formula(e) must be explicitly established and appear in the permit. Any special cases, such as case-specific equilibrium data, also must be established in advance. The source's monitoring and tracking methodology also must be established, replicable, and properly documented. That is, the inputs to the formula(e) must themselves be obtained through replicable procedures, and the operation of the formula(e) must replicably produce the emissions value that is to be compared to the source's emissions limit.

Although you are free to use the formula approach for any source that meets the requirements discussed above, we believe it is best suited to printers with operations that are highly variable. By "highly variable," we mean those operations whose VOC emissions are a function of multiple process parameters that often vary, and do so independently. For example, VOC emissions from a printing line may depend on a combination of factors, including line speed, the dimensions of the substrate, the percent of the surface area printed, the thickness of coating applied, the number of coating stations in use, and the VOC content of the inks coatings. At many sources, any or all of these parameters may vary widely from job to job depending on the product being produced and customer specifications, making it impossible, short of a formula approach, to correlate emissions with one, or even a few, of the parameters.

The potential benefits of using the formula approach include:

- Provides a verifiable and enforceable approach to calculating actual emissions from the facility; you know exactly how emissions are determined;
- Allows the facility significant flexibility to adjust its operations to meet customer demands and to reformulate the process materials to reduce VOC content (and emissions), facilitate possible pollution prevention and increased production;
- Eliminates the need to conduct daily emission calculations; and
- Enables most facilities to utilize their existing material and production tracking systems to verify the data needed to demonstrate compliance under a mass-balance equation-based approach.

Examples of situations where the mass-balance formula-based approach might be considered include demonstrations that:

- C An individual press or group of presses remains below a NSR/PSD threshold (e.g., 40 tons per year VOC emissions - generally taken to limit applicability of NSR/PSD);
- C The combined emissions from all presses remains below a threshold (i.e., major source - FESOP vs. title V applicability); and
- C The emissions from a facility correspond to a particular emissions fee.

In addition, the mass-balance equation-based approach, combined with a measure of production (hours of operation, impressions, etc.) may also be used to determine the emissions from individual presses within a group of related presses. For example, if total emissions for a group of presses is calculated and the production of a single press is 20 percent of the total production of the group of presses, it may be assumed that 20 percent of the emissions are attributable to that press. Use of such allocations is appropriate and often necessary where the group of presses share materials from a common source (e.g., multiple presses receiving ink from a common set of ink totes or central distribution system, fountain solution mixed and distributed to multiple presses by a single system, cleaning solvent dispensed from a single source for an entire pressroom).

ATTACHMENT C

4.4 HOW OFTEN MUST CONTROL AND CAPTURE DEVICE TESTING BE PERFORMED?

Individual permitting authorities have developed and implemented their own policies and regulations concerning the frequency of capture efficiency testing (M204), and destruction efficiency testing (M18, M25, M25A). At least one State is requiring capture and control efficiency testing every 2½ years and another state is requiring annual tests, even though many other existing State permits only require testing every 5 years. Conducting these types of tests frequently is costly and repeat testing may be unwarranted in cases where the system and the configuration of the presses have not changed since the previous test.

A printer must conduct the initial testing, in which the parameter(s) for ongoing control and capture device monitoring are identified and the operating range(s) for the parameter(s) is (are) established. As long as the source does not change operations in a way that could affect capture or control device efficiency (which would include decreasing the blower rating, adding printing decks, increasing the distance between presses and dryers, adding or removing floor sweeps, or modifying such that a permit change is required), the ongoing parameter monitoring generates data in the operating range(s) that assure compliance, and the printer practices good operating and maintenance procedures, only periodic retesting for control efficiency and for capture efficiency for unenclosed presses, coaters, or laminators is needed - typically once per title V permit term - unless you require more frequent testing.

(It is Bemis' understanding that the comment concerning testing once per Title V permit term is being deleted from the final guidance)