

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Foil Laminating, Inc., a Division of Glenmark Industries, Inc.
1000 Pidco Drive
Plymouth, Indiana 46563**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-7439-00050	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

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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 Management (OAM) and presented in the permit application.

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

The Permittee owns and operates a stationary gravure and coating and printing operation.

Responsible Official: Dennis Hostetler
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
SIC Code: 2672
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

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) One (1) Cerutti Model-V6-X451 rotogravure printer/coater and one (1) 1.8 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;
- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater and one (1) 2.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (3) One (1) Inta - Roto laminator/coater and one (1) 0.75 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater and one (1) 1.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

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

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

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

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

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

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

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

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

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

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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

- (b) 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, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

- (a) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:
 - (1) The applicable requirements are included and specifically identified in this permit;
 - (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary

thereof.

- (b) 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.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (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, OAM, 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, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

Indianapolis, Indiana 46206-6015

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

- (a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).

- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

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

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.24 Operational Flexibility [326 IAC 2-7-20]

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

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

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

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

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

B.25 Construction Permit Requirement [326 IAC 2]

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

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

B.29 Enhanced New Source Review [326 IAC 2]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of volatile organic compound (VOC) is less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification that would lead to an increase in volatile organic compound (VOC) emissions of 250 tons per year shall cause this source to be considered a major source under PSD.

C.2 Opacity [326 IAC 5-1]

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

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

This condition is not federally enforceable.

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

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

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

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

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

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

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

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]

[40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days before the intended test date.

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

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

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

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

Indianapolis, Indiana 46206-6015

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

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

C.11 Monitoring Methods [326 IAC 3]

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

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.13 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) **Submit:**
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date

provided in 40 CFR 68.10(a); or

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.17 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 a certified, annual emission statement that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for

purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations must be clearly identified in such reports. A reportable

deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

Stratospheric Ozone Protection

C.21 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

Enhanced New Source Review:

- (1) One (1) Cerutti Model-V6-X451 rotogravure printer/coater and one (1) 1.8 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5(c)(1)]

Pursuant to 326 IAC 8-5-5(c)(1), the VOC content of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

D.1.2 Rotogravure Printing Press NSPS [326 IAC 12] [40 CFR 60.430, Subpart QQ]

Pursuant to 40 CFR 60.432, the Permittee shall not cause to be discharged into the atmosphere from any affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 12] [40 CFR 60.433]

- (i) Pursuant to 40 CFR 60.433:
 - (a) The Permittee shall conduct performance tests in accordance with 40 CFR 60.8, under the following conditions:
 - (1) The performance averaging period for each test is 30 consecutive calendar days and not an average of three separate runs as prescribed under 40 CFR 60.8(f)
 - (2) Except as provided under 40 CFR 60.433 (f) and (g), if affected facilities routinely share the same raw ink storage/handling system with existing facilities, then temporary measurement procedures for segregating the raw inks, related coatings, VOC solvent, and water used at the affected facilities must be employed during the test. For this case, an overall emission percentage for the combined facilities as well as for only the affected facilities must be calculated during the test.
 - (3) For the purpose of measuring bulk storage tank quantities of each color of raw ink and each related coating used, the Permittee shall install, calibrate, maintain and continuously operate during the test one or more:
 - (i) Non-resettable totalizer metering device(s) for indicating the cumulative liquid volumes used at each affected facility; or
 - (ii) Segregated storage tanks for each affected facility to allow

determination of the liquid quantities used by measuring devices other than the press meters required under item 1) of this article;
or

- (iii) Storage tanks to serve more than one facility with the liquid quantities used determined by measuring devices other than press meters, if facilities are combined as described under 40 CFR 60.433 (d), (f), or (g).
- (4) The Permittee may choose to install an automatic temperature compensator with any liquid metering device used to measure the raw inks, related coatings, water, or VOC solvent used, or VOC solvent recovered.
 - (5) Records of the measured amounts used at the affected facility and the liquid temperature at which the amounts were measured are maintained for each shipment of all purchased material or on at least a weekly basis for:
 - (i) The raw inks and related coatings used;
 - (ii) The VOC and water content of each raw ink and related coating used as determined according to 40 CFR 60.435.
 - (iii) The VOC solvent and water added to the inks used;
 - (iv) The VOC solvent used as a cleaning agent; and
 - (v) The VOC solvent recovered.
 - (6) The density variations with temperature of the raw inks, related coatings, VOC solvents used, and VOC solvent recovered are determined by the methods stipulated in 40 CFR 60.435(d).
 - (7) The calculated emission percentage may be reported as rounded-off to the nearest whole number.
 - (8) Printing press startups and shutdowns are not included in the exemption provisions under 40 CFR 60.8(c). Frequent periods of press startups and shutdowns are normal operations and constitute representative conditions for the purpose of a performance test.
- (b) If an affected facility uses waterborne ink systems or a combination of waterborne and solvent-borne ink systems with a solvent recovery system, compliance is determined by the following procedures except as provided in 40 CFR 60.433 (d), (e), (f), and (g):
- (1) The mass of VOC in the solvent-borne and waterborne raw inks and related coatings used is determined by the following equation:

$$(M_o)_a = \sum_{i=1}^k 3(M_{ci})_a (W_{oi})_a + \sum_{i=1}^m 3(L_{ci})_a (D_{ci})_a (W_{oi})_a + \sum_{i=1}^n 3(L_{ci})_a (V_{oi})_a (D_{oi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of VOC content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different VOC solvent densities.

- (2) The total mass of VOC used is determined by the following equation:

$$(M_v)_a = (M_o)_a + \sum_{i=1}^m (L_{di})_a (D_{di})_a + (M_d)_a + \sum_{i=1}^n (L_{gi})_a (D_{gi})_a + (M_g)_a$$

where “**m**” and “**n**” are respective total numbers of VOC dilution and cleaning solvents measured as used by volume with different densities.

- (3) The mass of water in the waterborne raw inks and related coatings used is determined by the following equation:

$$(M_w)_a = \sum_{i=1}^k (M_{ci})_a (W_{wi})_a + \sum_{i=1}^m (L_{ci})_a (D_{ci})_a (W_{wi})_a + \sum_{i=1}^n (L_{ci})_a (V_{wi})_a (D_{wi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of water content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different water densities.

- (4) The total mass of water used is determined by the following equation:

$$(M_v)_a = (M_w)_a + (M_h)_c + \sum_{i=1}^m (L_{hi})_a (D_{hi})_a$$

where “**m**” is the total number of water dilution additions measured as used by volume with different densities.

- (5) The total mass of VOC solvent recovered is determined by the following equation:

$$(M_r)_a = (M_m)_a + \sum_{i=1}^k (L_{mi})_a (D_{mi})_a$$

where "k" is the total number of VOC solvents, miscellaneous solvent-borne waste inks, and waste VOC solvents measured as recovered by volume with different densities.

- (6) The average VOC emission percentage for the affected facility is determined by the following equation:

$$P_a = \frac{(M_i)_a - (M_r)_a}{(M_i)_a + (M_v)_a} * 100$$

- (ii) Pursuant to 40 CFR 60.435:

- (a) The Permittee of any affected facility using waterborne ink systems shall determine the VOC and water content of raw inks and related coatings used at the affected facility by:
- (1) Determination of the VOC and water content from the formulation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used; or
 - (2) Analysis of samples of each shipment of purchased raw inks and related coatings using a test method approved by the Administrator in accordance with 40 CFR 60.8(b).
- (b) The Permittee of any affected facility shall determine the density of raw inks, related coatings, and VOC solvents by:
- (1) Making a total of three determinations for each liquid sample as specified temperatures using the procedure outlined in ASTM D 1475-60 (Reapproved 1980), which is incorporated by reference. It is available from the American Society of Testing and Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103. It is also available for inspection at the Office of the Federal Register, 800 North Capitol Street, NW., suite 700, Washington, DC. This incorporation by reference was approved by the Director of the Federal Register on November 8, 1982. This material is incorporated as it exists on the date of approval and a notice of any change in these materials will be published in the Federal Register. The temperature and density is recorded as the arithmetic average of the three determinations; or
 - (2) Using literature values, at specified temperatures, acceptable to the Administrator.
- (c) If compliance is determined according to 40 CFR 60.433(e), (f), or (g), the existing as well as affected facilities are subject to the requirements of 40 CFR 60.435 (a) through (d).

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine

compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Monitoring

The Permittee shall record monthly the VOC content in the ink used when the printer/coater is in operation.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily 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.
- (1) The amount and VOC content of each ink used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the inks used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Rotogravure Printing Press NSPS [326 IAC 12] [40 CFR 60.434]

Pursuant to 40 CFR 60.434:

- (a) After completion of the performance test required by 40 CFR 60.8, the Permittee of any facility using waterborne ink systems or solvent-borne ink systems with solvent recovery systems shall record the amount and water used, solvent recovered, and estimated emission percentage for each performance averaging period and shall maintain these records for 2 years. The emission percentage is estimated as follows:
- (1) The performance averaging period for monitoring of proper operation and maintenance is a calendar month or 4 consecutive weeks, at the option of the Permittee.
 - (2) If affected facilities share the same raw ink storage/handling system with existing facilities, solvent recovered, and emission percentages for the combined facilities may be documented. Separate emission percentage for only the affected facilities are not required in this case. The combined emission percentage is compared to the overall average for the existing and affected facilities' emission

percentage determined during the most recent performance test.

- (3) Except as provided in article (4) of this paragraph, temperatures and liquid densities determined during the most recent performance test are used to calculate corrected volumes and mass quantities.
- (4) The Permittee may choose to measure temperatures for determination of actual liquid densities during each performance averaging period. A different base temperature may be used for each performance averaging period if desired by the Permittee.
- (5) The emission percentage is calculated according to the procedures under 40 CFR 60.433(b) through (g), whichever applies, or by a comparable calculation which compares the total solvent recovered to the total solvent used at the affected facility.

D.1.8 Rotogravure Printing Press NESHAP [40 CFR 63.820, Subpart KK]

Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with actual emissions less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with D.1.8 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater and one (1) 2.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (3) One (1) Inta - Roto laminator/coater and one (1) 0.75 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater and one (1) 1.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings from the laminators/coaters (Units #2-4) applied to the labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall not exceed 2.9 pounds of VOC per gallon of coating delivered to the applicator less water.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of each facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on each facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.3 Volatile Organic Compounds (VOC)

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

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

D.2.4 Monitoring

The permittee shall record monthly the VOC content in each coating used when the laminators/coaters (Units #2-4) are in operation.

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

D.2.5 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily 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 amount and VOC content of each coating material and solvent used.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Foil Laminating, Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-7439-00050

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Foil Laminating, Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-7439-00050

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
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: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Foil Laminating, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 47563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 47563
Part 70 Permit No.: T099-7439-00050
Facility: One (1) rotogravure printer/coater (Unit #1)
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for any combination of HAP's

YEAR: _____

Month	Worst Single HAP Usage (tons/month)	Total HAP Usage (tons/month)

- 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: _____

**OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE REPORT**

Source Name: Foil Laminating, Inc., a Division of Glenmark Industries, Inc.
 Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
 Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-7439-00050

Months: _____ to _____ Year: _____

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

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Foil Laminating, Inc., Division of Glenmark Industries, Inc.
Source Location: 1000 Pidco Drive, Plymouth, Indiana 46563
County: Marshall
SIC Code: 2672
Operation Permit No.: T099-7439-00050
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Foil Laminating, Inc., Division of Glenmark Industries, Inc. relating to the operation of a gravure coating and printing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) Eclipse Model 200 RH-D5 laminator/coater which can only laminate or coat at one time, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (2) One (1) Inta - Roto laminator/coater which can only laminate or coat at one time, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (3) One (1) Inta - Roto laminator/coater which can only laminate or coat at one time, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

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

The application includes information relating to the construction and operation of a rotogravure printing/coater, consisting of the following equipment:

- (1) The modification to one (1) Cerutti Model-V6-X451 rotogravure printer/coater which can only print or coat at one time, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;

The printer/coater was originally permitted as a laminator/coater under CP 099-3384, issued on April 25, 1994. It is now being modified to be a printer/coater.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) One (1) air makeup unit, Rapid 3100, heat input capacity of 3.8 million British thermal units per hour (mmBtu/hr);
- (2) Combustion source flame safety purging on startup;
- (3) Cleaners and solvents characterized as follows:
 - a) having a vapor pressure equal to or less than 2kPa; 15mmHg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - b) having a vapor pressure equal to or less than 0.7kPa; 5mmHg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (4) Closed loop heating and cooling systems;
- (5) Any operation using aqueous solutions containing less than 1 percent by weight of VOC's excluding HAPs;
- (6) 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;
- (7) Paved and unpaved roads and parking lots with public access; and
- (8) Purge double block and bleed valves.

Existing Approvals

The source has been operating under the following approval:

- (1) CP 099-3384, issued on April 25, 1994.

Enforcement Issue

There are no Enforcement actions pending.

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 December 10, 1996. Additional information was received on September 5, 1997.

A Notice of Administrative Completeness letter was mailed to the source on December 23, 1996.

This proposed Part 70 permit will also satisfy the requirements of Enhanced New Source Review (ENSR) for the printer/coater.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Enhanced New Source Review

- (a) The potential emissions of the one (1) rotogravure laminator/coater were 20.87 tons of volatile organic compounds (VOC) per year. However, the laminator/coater was never put into operation. During the construction, the decision was made to make this laminator/coater into a printer/coater. The one (1) rotogravure printer/coater is still being constructed as of August 26, 1997. The potential emissions of the one (1) rotogravure printer/coater are 40.47 tons of volatile organic compounds (VOC) per year.
- (b) The modification to change the one (1) Cerutti Model-V6-X451 rotogravure laminator/coater to a rotogravure printer/coater will not result in potential emissions greater than 250 tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less 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.

HAP's	Potential Emissions (tons/year)
Styrene	less than 10
TOTAL	less than 10

- (a) The potential emissions (as defined in the Indiana Rule) 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 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

- (c) The modification to change the one (1) Cerutti Model-V6-X451 rotogravure laminator/coater to a rotogravure printer/coater will not result in potential emissions greater than 250 tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1994 emission data.

Pollutant	Actual Emissions (tons/year)
PM	not available
PM-10	not available
SO ₂	not available
VOC	0.662
CO	not available
HAP(styrene)	0.0023
NO _x	not available

County Attainment Status

The source is located in Marshall County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) The rotogravure printer/coater is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ) because the potential emissions of the one (1) rotogravure laminator/coater were 20.87 tons of volatile organic compounds (VOC) per year. However, the laminator/coater was never put into operation. During the construction, the decision was made to make this laminator/coater into a printer/coater. The one (1) rotogravure printer/coater is still being constructed as of August 26, 1997. The potential emissions of the one (1) rotogravure printer/coater are 40.47 tons of volatile organic compounds (VOC) per year. A copy of the rule is enclosed.
 - (i) Pursuant to 40 CFR 60.432:
 - (a) The Permittee shall not cause to be discharged into the atmosphere from the affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.
 - (ii) Pursuant to 40 CFR 60.433:
 - (a) The Permittee shall conduct performance tests in accordance with 40 CFR 60.8, under the following conditions:
 - (1) The performance averaging period for each test is 30 consecutive calendar days and not an average of three separate runs as prescribed under 40 CFR 60.8(f)
 - (2) Except as provided under 40 CFR 60.433 (f) and (g), if affected facilities routinely share the same raw ink storage/handling system with existing facilities, then temporary measurement procedures for segregating the raw inks, related coatings, VOC solvent, and water used at the affected facilities must be employed during the test. For this case, an overall emission percentage for the combined facilities as well as for only the affected facilities must be calculated during the test.
 - (3) For the purpose of measuring bulk storage tank quantities of each color of raw ink and each related coating used, the Permittee shall install, calibrate, maintain and continuously operate during the test one or more:

- (i) Non-resettable totalizer metering device(s) for indicating the cumulative liquid volumes used at each affected facility; or
 - (ii) Segregated storage tanks for each affected facility to allow determination of the liquid quantities used by measuring devices other than the press meters required under item 1) of this article; or
 - (iii) Storage tanks to serve more than one facility with the liquid quantities used determined by measuring devices other than press meters, if facilities are combined as described under 40 CFR 60.433 (d), (f), or (g).
 - (4) The Permittee may choose to install an automatic temperature compensator with any liquid metering device used to measure the raw inks, related coatings, water, or VOC solvent used, or VOC solvent recovered.
 - (5) Records of the measured amounts used at the affected facility and the liquid temperature at which the amounts were measured are maintained for each shipment of all purchased material or on at least a weekly basis for:
 - (i) The raw inks and related coatings used;
 - (ii) The VOC and water content of each raw ink and related coating used as determined according to 40 CFR 60.435.
 - (iii) The VOC solvent and water added to the inks used;
 - (iv) The VOC solvent used as a cleaning agent; and
 - (v) The VOC solvent recovered.
 - (6) The density variations with temperature of the raw inks, related coatings, VOC solvents used, and VOC solvent recovered are determined by the methods stipulated in 40 CFR 60.435(d).
 - (7) The calculated emission percentage may be reported as rounded-off to the nearest whole number.
 - (8) Printing press startups and shutdowns are not included in the exemption provisions under 40 CFR 60.8(c). Frequent periods of press startups and shutdowns are normal operations and constitute representative conditions for the purpose of a performance test.
- (b) If an affected facility uses waterborne ink systems or a combination of waterborne and solvent-borne ink systems with a solvent recovery

system, compliance is determined by the following procedures except as provided in 40 CFR 60.433 (d), (e), (f), and (g):

- (1) The mass of VOC in the solvent-borne and waterborne raw inks and related coatings used is determined by the following equation:

$$(M_o)_a = \sum_{i=1}^k 3(M_{ci})_a (W_{oi})_a + \sum_{i=1}^m 3(L_{ci})_a (D_{ci})_a (W_{oi})_a + \sum_{i=1}^n 3(L_{ci})_a (V_{oi})_a (D_{oi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of VOC content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different VOC solvent densities.

For the one (1) rotogravure printer/coater:

$$k = m = n = 1$$

$$M_c = 5.09 \text{ lb/gal}$$

$$W_o = 0.056$$

$$L_c = 5.45 \text{ lb/gal}$$

$$D_c = 8.7 \text{ lb/gal}$$

$$V_o = 0.0692$$

$$M_o = (5.09)(0.056) + (5.45)(8.7)(0.056) + (5.45)(0.0692)(8.7)$$

$$M_o = 6.22 \text{ lb/gal}$$

- (2) The total mass of VOC used is determined by the following equation:

$$(M_t)_a = (M_o)_a + \sum_{i=1}^m 3(L_{di})_a (D_{di})_a + (M_d)_a + \sum_{i=1}^n 3(L_{gi})_a (D_{gi})_a + (M_g)_a$$

where “**m**” and “**n**” are respective total numbers of VOC dilution and cleaning solvents measured as used by volume with different densities.

For the one (1) rotogravure printer/coater:

$$m = n = 1$$

$$M_o = 6.22$$

$$D_d = M_d = L_g = D_g = M_g = 0$$

$$M_t = 6.22 + 0 + 0 + 0$$

$$M_t = 6.22 \text{ lb/gal}$$

- (3) The mass of water in the waterborne raw inks and related coatings used is determined by the following equation:

$$(M_w)_a = \sum_{i=1}^k (M_{ci})_a (W_{wi})_a + \sum_{i=1}^m (L_{ci})_a (D_{ci})_a (W_{wi})_a + \sum_{i=1}^n (L_{ci})_a (V_{wi})_a (D_{wi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of water content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different water densities.

For the one (1) rotogravure printer/coater:

$$k = m = n = 1$$

$$M_c = 5.09 \text{ lb/gal}$$

$$W_w = 0.53$$

$$L_c = 5.45 \text{ lb/gal}$$

$$D_c = 8.7 \text{ lb/gal}$$

$$V_w = 0.557$$

$$D_w = 8.34 \text{ lb/gal}$$

$$M_w = (5.09)(0.53) + (5.45)(8.7)(0.53) + (5.45)(0.557)(8.34)$$

$$M_w = 53.14 \text{ lb/gal}$$

- (4) The total mass of water used is determined by the following equation:

$$(M_v)_a = (M_w)_a + (M_h)_c + \sum_{i=1}^m (L_{hi})_a (D_{hi})_a$$

where "**m**" is the total number of water dilution additions measured as used by volume with different densities.

For the one (1) rotogravure printer/coater:

$$m = 1$$

$$M_w = 53.14 \text{ lb/gal}$$

$$M_h = 4.61 \text{ lb/gal}$$

$$L_h = 4.85 \text{ lb/gal}$$

$$D_h = 8.34 \text{ lb/gal}$$

$$M_v = 53.14 + 4.61 + (4.85)(8.34)$$

$$M_v = 98.20 \text{ lb/gal}$$

- (5) The total mass of VOC solvent recovered is determined by the following equation:

$$(M_r)_a = (M_m)_a + 3 \sum_{i=1}^k (L_{mi})_a (D_{mi})_a$$

where "k" is the total number of VOC solvents, miscellaneous solvent-borne waste inks, and waste VOC solvents measured as recovered by volume with different densities.

For the one (1) rotogravure printer/coater:

$$k = 1$$

$$M_m = L_m = D_m = 0$$

$$M_r = 0 + 0 + 0$$

$$M_r = 0 \text{ lb/gal}$$

- (6) The average VOC emission percentage for the affected facility is determined by the following equation:

$$P_a = \frac{(M_t)_a - (M_r)_a}{(M_t)_a + (M_v)_a} * 100$$

For the one (1) rotogravure printer/coater:

$$M_t = 6.22 \text{ lb/gal}$$

$$M_r = 0 \text{ lb/gal}$$

$$M_v = 98.20 \text{ lb/gal}$$

$$P_a = (6.22 - 0) / (6.22 + 98.20) * 100$$

$P_a = 5.96 \% < 16\%$, therefore the one (1) rotogravure printer/coater is in compliance.

- (iii) 40 CFR 60.433(c) through (g) are not applicable to the one (1) rotogravure printer/coater because it is applicable to the requirements of 40 CFR 60.433(b).

- (iv) Pursuant to 40 CFR 60.434:

- (a) After completion of the performance test required by 40 CFR 60.8, the Permittee of any facility using waterborne ink systems or solvent-borne ink systems with solvent recovery systems shall record the amount and water used, solvent recovered, and estimated emission percentage for each performance averaging period and shall maintain these records for 2 years. The emission percentage is estimated as follows:

- (1) The performance averaging period for monitoring of proper operation and maintenance is a calendar month or 4 consecutive

weeks, at the option of the Permittee.

- (2) If affected facilities share the same raw ink storage/handling system with existing facilities, solvent recovered, and emission percentages for the combined facilities may be documented. Separate emission percentage for only the affected facilities are not required in this case. The combined emission percentage is compared to the overall average for the existing and affected facilities' emission percentage determined during the most recent performance test.
 - (3) Except as provided in article (4) of this paragraph, temperatures and liquid densities determined during the most recent performance test are used to calculate corrected volumes and mass quantities.
 - (4) The Permittee may choose to measure temperatures for determination of actual liquid densities during each performance averaging period. A different base temperature may be used for each performance averaging period if desired by the Permittee.
 - (5) The emission percentage is calculated according to the procedures under 40 CFR 60.433(b) through (g), whichever applies, or by a comparable calculation which compares the total solvent recovered to the total solvent used at the affected facility.
- (v) Pursuant to 40 CFR 60.435:
- 40 CFR 60.435 (a) and (b) are not applicable because the one (1) rotogravure printer/coater uses a waterborne ink system.
- (a) The Permittee of any affected facility using waterborne ink systems shall determine the VOC and water content of raw inks and related coatings used at the affected facility by:
 - (1) Determination of the VOC and water content from the formulation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used; or
 - (2) Analysis of samples of each shipment of purchased raw inks and related coatings using a test method approved by the Administrator in accordance with 40 CFR 60.8(b).
 - (b) The Permittee of any affected facility shall determine the density of raw inks, related coatings, and VOC solvents by:
 - (1) Making a total of three determinations for each liquid sample as specified temperatures using the procedure outlined in ASTM D 1475-60 (Reapproved 1980), which is incorporated by reference. It is available from the American Society of Testing and

Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103. It is also available for inspection at the Office of the Federal Register, 800 North Capitol Street, NW., suite 700, Washington, DC. This incorporation by reference was approved by the Director of the Federal Register on November 8, 1982. This material is incorporated as it exists on the date of approval and a notice of any change in these materials will be published in the Federal Register. The temperature and density is recorded as the arithmetic average of the three determinations; or

- (2) Using literature values, at specified temperatures, acceptable to the Administrator.
- (c) If compliance is determined according to 40 CFR 60.433(e), (f), or (g), the existing as well as affected facilities are subject to the requirements of paragraphs (a) through (d) of this section.
- (b) The one (1) rotogravure printer/coater has potential emissions of Hazardous Air Pollutants (HAP) of less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore, the one (1) rotogravure printer/coater is not considered a major source. Pursuant to 40 CFR 63.820(a)(2), Subpart KK (National Emission Standards for the Printing and Publishing Industry), the one (1) rotogravure printer/coater is an area source. An area source is subject to the following requirements:
 - (1) Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with actual emissions less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
 - (2) Pursuant to 40 CFR 63.830(b)(1), the Permittee shall submit an initial notification required in 40 CFR 63.9(b).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential volatile organic compound (VOC) emissions are less than 250 tons per year. Any change or modification that would lead to an increase in volatile organic compound (VOC) emissions of 250 tons per year shall cause this source to be considered a major source under PSD. The source shall be allowed to add insignificant activities, as listed in 326 IAC 2-7-1(20), not already in this permit provided any modification that would lead to an increase in allowable emissions greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to the New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Volatile Organic Compounds (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 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

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

The three (3) laminators/coaters (Units #2 - #4) are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because the entire surface of the substrate is being coated. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings from the three (3) laminators/coaters (Units #2 - #4) applied to labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall not exceed 2.9 pounds of VOC per gallon of coating delivered to the applicator less water. Based on the material safety data sheets (MSDS) submitted and the calculations made, the three (3) laminators/coaters comply with this rule (page one (1) of Appendix A).

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

The one (1) rotogravure printer/coater (Unit #1) is subject to the requirements of 326 IAC 8-5-5, because the potential emissions of volatile organic compounds (VOC) are greater than twenty-five (25) tons per year. Pursuant to 326 IAC 8-5-5(c)(1), the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water. Based on the material safety data sheets (MSDS) submitted and the calculations made, the one (1) rotogravure printer/coater complies with this rule (page two (2) of Appendix A).

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 099-3383-00050, issued on April 25, 1994, the particulate matter (PM) overspray from the three (3) laminators/coaters (Units #2 - #4) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand

(60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Based on the material safety data sheets (MSDS) and calculations made, the three (3) laminators/coaters comply with this rule (page one (1) of Appendix A).

326 IAC 6 (Particulate limitations)

Pursuant to CP 099-3383-00050, issued on April 25, 1994, the particulate matter (PM) overspray from the three (3) laminators/coaters (Units #2 - #4) shall be considered in compliance with 326 IAC 6, provided that the overspray is not visibly detectable at the exhaust, accumulated on the rooftops or on the ground, or causing any nuisance problems.

Compliance Requirements

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

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

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

The one (1) rotogravure printer/coater (Unit #1) has applicable compliance monitoring conditions:

- (a) The Permittee shall record the VOC content in each ink used when the printing press is in operation.
- (b) The Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with actual emissions less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

The first monitoring condition is necessary because the VOC fraction of the ink, as it is applied to the substrate, must contain twenty-five percent (25%) by volume or less volatile organic compound (VOC) and seventy-five percent (75%) by volume or more of water to ensure compliance with 326 IAC 8-5-5(c)(1) (Graphic Arts Operations). The second monitoring

condition is necessary to ensure that this facility is an area source and does not become a major source of HAPs to ensure compliance with 40 CFR 63.820, Subpart KK (National Emission Standards for the Printing and Publishing Industry).

The three (3) laminators/coaters (Units #2 - #4) have applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the total amount of coating used, VOC and HAP content in each coating daily when the laminators/coaters are in operation.

These monitoring conditions are necessary because the VOC content used in the coating operations must be less than 2.9 pounds per gallon (less water) to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations).

Air Toxic Emissions

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

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

Conclusion

The operation of this gravure coating and printing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T099-7439-00050**.

Table 1

Description of facility: One (1) Eclipse laminator/coater (Unit #2) and two (2) Inta - Roto laminator/coater (Units #3 - #4)
Max Rating: Eclipse - 67,500 ft²/hr, Inta - Roto - 65,000 ft²/hr and 57,300 ft²/hr
Construction Date: Eclipse - February, 1995, Inta - Roto - August, 1994 and September, 1994
Control Device (if any): none
Stack/Vent ID: Eclipse - S2, Inta - Roto - S3 and S4
Facility class: **Description:** Surface Coating: roll - coating, rotogravure

EMISSION LIMITATIONS				
Numerical Emission Limit:	2.9 pounds VOC (less water) per gallon coating			
Regulation/Citation:	326 IAC 8-2-5			
Compliance Demonstration:	Record Keeping			
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	N/A			
Testing Method/Analysis:	N/A			
Testing Frequency/Schedule:	N/A			
Submittal of Test Results:	N/A			
COMPLIANCE MONITORING				
Monitoring Description:	recording VOC and HAP content			
Monitoring Method:	recording VOC and HAP content			
Monitoring Regulation/Citation:	326 IAC 8-2-5			
Monitoring Frequency:	monthly			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC and HAP content			
Recording Frequency:	monthly			
REPORTING REQUIREMENTS				
Information in Report:	N/A			
Reporting Frequency/Submittal:	N/A			
Additional Comments:	N/A			

Table 2

Description of facility: One (1) rotogravure printer/coater (Unit #1)
Max Rating: 82,500 square feet per hour (ft²/hr)
Construction Date: construction not yet complete as of 8/26/97
Control Device (if any): none
Stack/Vent ID: S₁

Facility class: Description: Rotogravure Printing: water based inks

EMISSION LIMITATIONS				
Numerical Emission Limit:	(0.5) pounds of VOC or less per pound of solids in the ink	VOC emissions less than 16% of total mass of VOC solvent	less than 10 ton/yr of any single HAP and less than 25 ton/yr of any combination of HAPs	
Regulation/Citation:	326 IAC 8-5-5(c)(1)	40 CFR 60.430 (Subpart QQ)	40 CFR 63.820(a)(2) (Subpart KK)	
Compliance Demonstration:	Record Keeping	Performance Testing	Record Keeping	
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	N/A	VOC emission percentage	N/A	
Testing Method/Analysis:	N/A	see 40 CFR 60.433	N/A	
Testing Frequency/Schedule:	N/A	60-180 days after achieving maximum production	N/A	
Submittal of Test Results:	N/A	N/A	N/A	
COMPLIANCE MONITORING				
Monitoring Description:	recording VOC content	recording VOC and water content in raw inks and related coatings	recording measurements and calcs of actual HAP emissions	
Monitoring Method:	recording VOC content	recording VOC and water content in raw inks and related coatings	recording measurements and calcs of actual HAP emissions	
Monitoring Regulation/Citation:	326 IAC 8-5-5(c)(1)	40 CFR 60.435	40 CFR 63.829(d)	
Monitoring Frequency:	monthly	during testing	monthly	
RECORD KEEPING				

Parameter/Pollutant to be Recorded:	VOC content	VOC and water content of raw inks and related coatings	actual HAP emissions	
Recording Frequency:	monthly	during testing	monthly	
REPORTING REQUIREMENTS				
Information in Report:	N/A	N/A	N/A	
Reporting Frequency/Submittal:	N/A	N/A	N/A	
Additional Comments:	N/A	N/A	N/A	

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name: Foil Laminating, Inc. a Division of Glenmark Industries, Inc.
Source Location: 1000 Pidco Drive, Plymouth, Indiana 46563
County: Marshall
SIC Code: 2672
Operation Permit No.: T099-7439-00050
Permit Reviewer: Cathie Moore

On November 6, 1997, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Foil Laminating, Inc. had applied for a Part 70 Operating Permit to operate a gravure printing and coating operation. The notice also stated that OAM 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.

The Technical Support Document (TSD) has been changed as follows:

1. Insignificant Activities, page 2 of 17, item (6) has been changed from:
 - (6) 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;

to be as follows (bold added for emphasis):

- (6) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection **cyclone exhausting to a compactor**;

Since this is an insignificant activity that has no state or federal rules applicable to it, there is no change to the Part 70 Permit. The Technical Support Document (TSD) has not been physically changed, however the change is noted in this Addendum to the Technical Support Document (TSD).

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. Condition A.2 has been changed from:
 - 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) One (1) Cerutti Model-V6-X451 rotogravure printer/coater, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;
- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater, identified as Unit #2, with a

maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;

- (3) One (1) Inta - Roto laminator/coater, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

to be as follows to incorporate the curing ovens for each printer/coater or laminator/coater (bold added for emphasis):

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) One (1) Cerutti Model-V6-X451 rotogravure printer/coater **and one (1) 1.8 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;
- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater **and one (1) 2.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (3) One (1) Inta - Roto laminator/coater **and one (1) 0.75 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater **and one (1) 1.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

2. Condition A.5 has been changed from:

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the effective date of this permit. All terms and conditions in such registrations and permits are no longer in effect.

to be as follows (bold added for emphasis):

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the **date of issuance** of this permit. All terms and conditions in such registrations and permits are no longer in effect.

3. Condition B.8 has been changed from:

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

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect

information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

to be as follows:

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

4. Condition B.13 has been changed from:

B.13 Emergency Provisions [326 IAC 2-7-16]

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

except as provided in 326 IAC 2-7-16.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

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

Facsimile Number: 317-233-5967

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to

this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

to be as follows (bold added for emphasis):

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

5. Condition B.20 has been changed from:

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

to be as follows (bold added for emphasis):

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), **except as provided by 326 IAC 2-7-12(c)**.
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

6. Condition B.21 has been changed from:

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

to be as follows (bold added for emphasis):

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, **review by affected states**, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

7. Condition B.22 has been changed from:

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) A provision stating that no Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

to be as follows:

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) ~~A provision stating that~~ No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

8. Condition C.9 has been changed from:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

to be as follows (bold added for emphasis):

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

9. Condition C.17 has been changed from:

C.17 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 a certified, annual emission statement 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) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be

submitted to:

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

to be as follows (bold added for emphasis):

C.17 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 a certified, annual emission statement that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) **Indicate** actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

10. The equipment listed in Section D.1 has been changed from:

Enhanced New Source Review:

- (1) One (1) Cerutti Model-V6-X451 rotogravure printer/coater, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;

to be as follows (bold added for emphasis):

Enhanced New Source Review:

- (1) One (1) Cerutti Model-V6-X451 rotogravure printer/coater **and one (1) 1.8 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #1, with a maximum capacity of 82,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₁;

11. Condition D.1.3 (Preventive Maintenance Plan) was deleted from the permit as it is no longer needed for this equipment. The remaining conditions have been re-numbered.

12. Condition D.1.9 has been added as follows:

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with D.1.9 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

13. The equipment listed in Section D.2 has been changed from:

- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (3) One (1) Inta - Roto laminator/coater, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

to be as follows (bold added for emphasis):

- (2) One (1) Eclipse Model 200 RH-D5 laminator/coater **and one (1) 2.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #2, with a maximum capacity of 67,500 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₂;
- (3) One (1) Inta - Roto laminator/coater **and one (1) 0.75 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #3, with a maximum capacity of 65,000 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₃; and
- (4) One (1) Inta - Roto laminator/coater **and one (1) 1.0 million British thermal unit per hour (mmBtu/hr) natural gas fired curing oven**, identified as Unit #4, with a maximum capacity of 57,300 square feet per hour (ft²/hr), exhausting at one (1) stack, identified as S₄.

There are no new conditions or changed conditions due to the addition of these curing ovens.

14. Condition D.2.2 (Preventive Maintenance Plan) was deleted from the permit as it is no longer needed for this equipment. The remaining conditions have been re-numbered.

15. On the Emergency/Deviation Occurrence Report Form, the fax number was changed from: (317) 233-6865 to (317) 233-5967.

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

Company Name: Foil Laminating, Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, IN 46563
Part 70: T099-7439-00050
Pit ID: 099-00050
Reviewer: Cathie Moore
Date: 08/15/97

THROUGHPUT							
Press I.D.	MAXIMUM LINE SPEED FEET MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin ² /YEAR
Rotogravure (Unit #1)	500	12	33	60	8760	1000000	104069

INK VOCS						
Ink Name Press Id	Maximum Coverage lbs/ MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² / Year	Tons 2000 lbs	Tons Year
Grav. W.B. Ovenable coating	13.89	6%	100.00%	104069	2000	40.47

Total VOC	40.47	Ton/yr
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*VOC = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
 METHODOLOGY

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

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPE OF PRINTERS HAVE A FLASH OFF OF 100%

**Appendix A: Emissions Calculations
VOC and Particulate
From inks used in Printing Press #1**

**Company Name: Foil Laminating , Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, IN 46563
T: T099-7439-00050
Plt ID: 099-00050
Reviewer: Cathie Moore
Date: 8/25/97**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Non-Vol (solids)	lb VOC /gal solids
Propex II G/S Yellow (Mfg ID W-175476)	8.9	58.02%	0.0%	58.0%	37.11%	13.87
Propex II Cyan Blue (Mfg ID W-175477)	9.1	59.38%	0.0%	59.4%	34.21%	15.74
Propex II Cyan Green (Mfg ID W-175474)	9.4	58.50%	0.0%	58.5%	32.70%	16.85
Propex II Rubine Red (Mfg ID W-175478)	9.0	60.15%	0.0%	60.2%	34.04%	15.87
Propex II Diet Coke Grey (Mfg ID W-175587)	10.9	46.48%	0.0%	46.5%	37.61%	13.42
Propex II Coke Red (Mfg ID W-175588)	9.0	57.94%	0.0%	57.9%	36.65%	14.15
Propex II Black (Mfg ID W-175479)	9.0	59.59%	0.0%	59.6%	34.28%	15.70
Propex II 200 Red (Mfg ID W-175480)	9.0	59.68%	0.0%	59.7%	34.77%	15.36
Propex II Extender (Mfg ID W-175-115)	8.4	68.93%	0.0%	68.9%	29.16%	19.81

State Potential Emissions

Add worst case coating to all solvents

METHODOLOGY

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Foil Laminating, Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, IN 46563
Part 70: T099-7439-00050
Pit ID: 099-00050
Reviewer: Cathie Moore
Date: 08/15/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Water Based Ovenable Coating (Unit #2)	8.7	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	67.500	1.10	0.49	7.56	181.53	33.13	0.00	1.30	100%	
Water Based Ovenable Coating (Unit #3)	8.7	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	65.000	1.10	0.49	7.28	174.81	31.90	0.00	1.30	100%	
Water Based Ovenable Coating (Unit #4)	8.7	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	57.300	1.10	0.49	6.42	154.10	28.12	0.00	1.30	100%	
State Potential Emissions											21.27	510.44	93.15	0.00			
Add worst case coating to all solvents																	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used