

**NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT**

Proposed Approval of Construction and Operation Permit

for **Boots Creek Converting, Inc.**
in **Grant County**

CP 053-8164, Plt ID 053-00054

Notice is hereby given that the above company located at 1629 South Joaquin Drive, Marion, Indiana 46952, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a permit to construct and operate a paper plate and cup printing source. Based on 8,760 hours of operation per year, the volatile organic compound (VOC) and allowable emissions are 49.4 tons per year. The VOC emissions will be limited to 19.0 tons per year. A single and total hazardous air pollutants are limited to 1.8 and 4.4 tons per year, respectively.

IDEM is aware that this paper plate and cup printing source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Notice is hereby given that there will be a period of 30 days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Marion Public Library located at 600 South Washington Street, Marion, Indiana**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If appropriate adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Management (OAM), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 516-691-3395 or in Indiana 1-800-451-6027 (ext 516-691-3395).

Paul Dubenetzky, Chief
Permit Branch
Office of Air Management

MLK/MES

**CONSTRUCTION PERMIT AND PERMIT BY RULE
OFFICE OF AIR MANAGEMENT**

**Boots Creek Converting, Inc.
1629 South Joaquin Drive
Marion, Indiana 46952**

is hereby authorized to construct a paper plate and cup printing source, consisting of:

- (1) One (1) flexographic printing press, known as printer #1, exhausted through side vent P-1, capacity: 250 feet per minute and 34.25 inches wide.
- (2) One (1) flexographic printing press, known as printer #2, exhausted through roof vent P-2, capacity: 600 feet per minute and 34.25 inches wide.
- (3) One (1) paper cutting area.
- (4) Eleven (11) natural gas-fired ceiling mounted space heaters rated at 100 British thermal units per hour, each.
- (4) Four (4) general ventilation exhaust fans.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1, 326 IAC 2-10 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP 053-8164-00054	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).
 - (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit and require compliance with Permit By Rule, 326 IAC 2-10.
7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
 - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
 - (a) In the event that ownership of this paper plate and cup printing source is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
 - (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

Opacity Limitations

7. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
- (a) visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings.
 - (b) visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

Particulate Matter (PM) Limitation

8. That pursuant to 326 IAC 6-3 (Process Operations), the emissions from the paper cutting operation shall not exceed the allowable particulate matter (PM) emission rate of 4.34 pounds per hour.

Fugitive Dust Emissions

9. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

Volatile Organic Compound

10. Pursuant to 326 IAC 2-10, the input volatile organic compounds (VOC) to the two (2) flexographic presses shall be limited to 1.58 tons per month (19.0 tons per year).

Volatile Organic Compound (VOC) Limitations

11. Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations)
- (a) the volatile fraction of the ink, as applied to the substrate, contains 25 percent by volume or less of organic solvent and 75 percent by volume or more of water.
 - (b) the ink, as applied to the substrate, less water contains 60 percent by volume or more non-volatile material.
- or
- (c) the ink is limited to 0.5 pound of VOC per pound of solids.

HAPs Limitation

12. That pursuant to 326 IAC 2-10, the worst case single HAP shall be limited to 0.150 tons per month (1.8 tons per year) and the combination of HAPs shall be limited to 0.367 tons per month (4.4 tons per year).

Reporting Requirements

13. That a log of information necessary to document compliance with operation permit condition nos. 10 and 12 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

- (a) An annual summary 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

This statement must be received by July 1 of each year in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

- (b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
- (i) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction and ending on December 31 of that year.

Open Burning

14. That 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.

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

Annual Report

Source Name: Boots Creek Converting, Inc.
 Source Address: 1629 South Joaquin Drive, Marion, Indiana 46952
 Permit No.: CP 053-8164-00054
 Facility: Two (2) Flexographic Printing Presses
 Parameter: VOC and HAPs Delivered to the Printing Presses Including Clean-up Solvents
 Limit: 1.58 Tons per Month of VOC (19.0 Tons per Year)
 0.150 Tons per Month of Any Single HAP (1.8 Tons per Year)
 0.367 Tons per Month of the Combination of HAPs (4.4 Tons per Year)

Year: _____

Month	Total VOC (tons)	Combination of HAPs (tons)	Worst Case Single HAP (tons)
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			

9 No deviation occurred this year.
 9 Deviation/s occurred in this year.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation and Permit By Rule

Source Background and Description

Source Name: Boots Creek Converting, Inc.
 Source Location: 1629 South Joaquin Drive, Marion, Indiana 46952
 County: Grant
 Construction Permit No.: CP 053 - 8164 - 00054
 SIC Code: 2679
 Permit Reviewer: Mark L. Kramer

The Office of Air Management (OAM) has reviewed an application from Boots Creek Converting, Inc. relating to the construction and operation of a paper plate and cup printing source, consisting of the following equipment:

- (1) One (1) flexographic printing press, known as printer #1, exhausted through side vent P-1, capacity: 250 feet per minute and 34.25 inches wide.
- (2) One (1) flexographic printing press, known as printer #2, exhausted through roof vent P-2, capacity: 600 feet per minute and 34.25 inches wide.
- (3) One (1) paper cutting area.
- (4) Eleven (11) natural gas-fired ceiling mounted space heaters rated at 100 British thermal units per hour, each.
- (4) Four (4) general ventilation exhaust fans.

This source has opted for Permit by Rule (326 IAC 2-10) to satisfy the requirements of Title V. This rule limits actual emissions to less than 20% of the Title V major source thresholds.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
P-1	Printing Press #1	16	2.26	unknown	unknown
P-2	Printing Press #2	20	2.26	unknown	unknown

Enforcement Issue

IDEM is aware that this paper plate and cup printing source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An application for the purposes of this review was received on January 30, 1997, with additional information received on June 2 and 16, 1997.

Emissions Calculations

See pages 1 - 3 of Appendix A (Emissions Calculation Spreadsheets) for detailed calculations of the printing operations, natural gas combustion and hazardous air pollutants.

PM emissions from the paper cutting area have been estimated at 0.05 pounds per tons of paper processes. Utilizing the maximum paper processing weight of 3 tons per hour yields a potential PM emission rate of 0.15 pounds per hour or 0.657 tons per year.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	37.5	0.657
Particulate Matter (PM ₁₀)	37.5	0.657
Sulfur Dioxide (SO ₂)	0.000	0.000
Volatile Organic Compounds (VOC)	49.4*	49.4
Carbon Monoxide (CO)	0.000	0.000
Nitrogen Oxides (NO _x)	0.000	0.000
Single Hazardous Air Pollutant (HAP)	12.5*	12.5
Combination of HAPs	27.6*	27.6

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. The paper cutting operations are subject to 326 IAC 6-3, Particulate Emission Limitations. 326 IAC 6-3-2 Process Operations limit the particulate matter to $E = 4.10 P^{0.67}$ or 8.56 pounds per hour (37.5 tons per year) for a process weight of 3.0 tons per hour.
- (b) The potential particulate matter emissions before control (0.657 tons per year) are less than the allowable emissions (37.5 tons per year), therefore, the potential emissions before control are used for the permitting determination.

- (c) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.
- (e) The allowable emissions marked with an asterisk (*) will be limited to 19.0, 1.8, and 4.4 tons per year of actual emissions for VOC, a single HAP and the combination of HAPs, respectively, to comply with the requirements of 326 IAC 2-10 (Permit by Rule). Actual PM₁₀ emissions will be allowed to increase to no more than 19 tons per year to comply with the requirements of 326 IAC 2-10.

County Attainment Status

- (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. Grant County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Grant County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on limited production):

Pollutant	Emissions (tons/year)
PM	0.657
PM ₁₀	0.657
SO ₂	0.000
VOC	19.0
CO	0.000
NO _x	0.000
Single HAP	1.8
Combination HAPs	4.4

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is subject to the Part 70 Permit requirements since the potential to emit (PTE) of:

- (a) a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year, and
- (b) any combination of HAPs is greater than or equal to 25 tons/year.

However, since the source has elected to limit actual emissions to less than 20 percent of the Title V threshold levels to comply with 326 IAC 2-10, Title V does not apply to this source anymore. The actual emission rates equivalent to 20 percent of the Title V threshold levels are: VOC = 20 tons per year, PM₁₀ = 20 tons per year, single HAP = 2.0 tons per year and the combination of HAPs = 5.0 tons per year.

This is the first air approval issued to the source.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this facility.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

Since this source is located in Grant County and the potential to emit VOC is less than one hundred (100) tons per year, 326 IAC 2-6 does not apply. Since this source is not one of the 28 listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply.

326 IAC 5-1-2 (Visible Emission Limitations)

This rule requires the visible emissions from all operations not subject to NSPS Subpart I to meet the following:

- (a) visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
- (b) visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6 hour period.

326 IAC 6-3 (Process Operations)

The paper cutting operations are subject to 326 IAC 6-3, Process Operations. 326 IAC 6-3-2 Particulate Emission Limitations limit the particulate matter to $E = 4.10 P^{0.67}$ or 8.56 pounds per hour (37.5 tons per year) for a process weight of 3.0 tons per hour. This 37.5 tons per year emission rate is greater than the aforementioned potential PM emission rate of 0.657 tons per year, thus the paper cutting operations comply with this rule. However, since all PM is assumed to be PM_{10} and this PM emission limit of 37.5 tons per year is greater than the Permit By Rule actual emission rate of PM_{10} of 20 tons per year, the allowable PM emissions will be limited to 4.34 pounds per hour (19 tons per year).

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

This rule excludes single pieces of equipment that meet the emission limitations contained in 326 IAC 8-5-5 which conduct flexographic printing operations in line with surface coating lines. Therefore, 326 IAC 8-2-5 does not apply to this source.

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

Since the two (2) flexographic printing presses have the potential to emit more than 25 tons per year of VOC, this rule is applicable. 326 IAC 8-5-5 requires:

- (a) the volatile fraction of the ink, as applied to the substrate, contains 25 percent by volume or less of organic solvent and 75 percent by volume or more of water.
 - (b) the ink, as applied to the substrate, less water contains 60 percent by volume or more non-volatile material.
- or
- (c) the ink is limited to 0.5 pound of VOC per pound of solids.

Based on the calculations shown on page 1 of 3 of Appendix A, all inks comply with the 0.5 lbs of VOC per pound of solid limitation of Rule 326 IAC 8-5-5.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 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) Construction Permit Application Form Y.

- (a) This new source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached spreadsheets for detailed potential air toxic calculations.

Boots Creek Converting, Inc.
Marion, Indiana
Permit Reviewer: MES

Page 6 of 6
CP 053-8164
Plt ID 053-00054

Conclusion

The construction of this paper plate and cup printing source will be subject to the conditions of the attached proposed **Construction Permit No. CP 053-8164-00054**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Boots Creek Converting, Inc.
Source Location: 1629 South Joaquin Drive, Marion, Indiana 46952
County: Grant
Construction Permit No.: CP 053 - 8164 - 00054
SIC Code: 2679
Permit Reviewer: Mark L. Kramer

On July 17, 1997, the Office of Air Management (OAM) had a notice published in the Marion Chronicle Tribune, Marion, Indiana, stating that Boots Creek Converting, Inc. had applied for a Construction Permit to construct and operate a paper plate and cup printing source. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review the Office of Air Management (OAM) has decided to make the following change in the Construction Permit:

That pursuant to 326 IAC 2-10, Permit By Rule, the reporting requirements will be revised to indicate annual rather than quarterly submittals. Operation Condition No. 13 of the permit has been revised to read as follows:

Reporting Requirements

13. That a log of information necessary to document compliance with operation permit condition nos. 10 and 12 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

(a) An annual summary 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

This statement must be received by July 1 of each year in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) Delivered by U.S. mail and postmarked on or before the date it is due; or

(ii) Delivered by any other method if it is received and stamped by IDEM, OAM on or before the date it is due.

- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction and ending on December 31 of that year.

HAP Emission Calculations

Company Name: Boots Creek Converting, Inc.
 Address City IN Zip: 1629 South Joaquin Drive, Marion, IN 46952
 CP: 053-8164
 Plt ID: 053-00054
 Reviewer: Mark L. Kramer
 Date: January 30, 1997

THROUGHPUT	Maximum						
Press ID	Line Spd ft Min	Feet to Inches	Max Print Width Inches	60 Min Hour	8760 Hr Year	1/1000000	MMin ² /YEAR
Flexographic Printers #1 and #2	(250+600) 850	12	34.25	60	8760	1000000	183618

Material	MMin ² /yr	Maximum Coverage lbs/MMin ²	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Ethylene Glycol						Glycol Ethers Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Total (tons/yr)
RUW18934	183618.36	6.940000	1.00	1.70%	3.52%						10.82	22.43	
RUY18932	183618.36	4.750000	1.00	2.65%	6.32%						11.53	27.56	
RUB18942	183618.36	3.000000	1.00	2.48%	6.45%						6.84	17.77	
RUR18936	183618.36	3.000000	1.00	2.50%	6.50%						6.88	17.89	
RUK22436	183618.36	3.000000	1.00	0.00%	0.00%						0.00	0.00	
RUG18940	183618.36	4.750000	1.00	1.84%	4.65%						8.04	20.27	
RUY18933	183618.36	3.000000	1.00	2.45%	6.37%						6.75	17.54	
RUK20468	183618.36	3.000000	1.00	2.59%	6.74%						7.14	18.57	
RUB20306	183618.36	3.000000	1.00	2.44%	6.34%						6.72	17.47	
RUG18939	183618.36	3.000000	1.00	2.03%	5.28%						5.59	14.53	
RUB18941	183618.36	3.000000	1.00	2.71%	7.06%						7.48	19.44	
RUR20347	183618.36	3.000000	1.00	2.20%	5.71%						6.05	15.72	
RUK21936	183618.36	3.000000	1.00	1.77%	0.89%						4.88	2.44	
RUW19877	183618.36	1.850000	1.00	3.96%	10.30%						6.73	17.49	
62-23626	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
62-23814	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
62-24641	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
62-24664	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
62-24665	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
62-41805	183618.36	10.400000	1.00	0.20%	0.00%						1.91	0.00	
RUK22071	183618.36	3.000000	1.00	0.00%	0.00%						0.00	0.00	
COATING 69-9302	183618.36	10.400000	1.00	0.10%	0.00%						0.95	0.00	

Total State Potential Emissions

TOTALS:	(tons/yr):	12.489	27.561	40.051
	(lb/hr):	2.854	6.298	
	(g/sec):	0.360	0.794	

METHODOLOGY

HAPS emission rate (tons/yr) = Annual Printing Capacity (MMin²) * Coverage (lbs/MMin²) * Weight % HAP * 1 ton/2000 lbs

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr < 0.3
 Residential Furnaces**

Company Name: Boots Creek Converting, Inc.
Address City IN Zip: 1629 South Joaquin Drive, Marion, IN 46952
CP: 053-8164
Plt ID: 053-00054
Reviewer: Mark L. Kramer
Date: January 30, 1997

11 space heaters @ 100 Btu/hr, each

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.001	0.01

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.2	11.2	0.6	94.0	7.3	40.0
Potential Emission in tons/yr	0.000	0.000	0.000	0.000	0.000	0.000

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 94

Emission Factors for CO: uncontrolled = 40

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3.

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