February 27, 2004

Mr. Larry Briles
MeadWestvaco Corporation
6302 Churchman Bypass
Indianapolis, Indiana 46203

Re: Registered Construction and Operation Status, 097-18627-00030

Dear Mr. Briles:

The application from MeadWestvaco, received on January 15, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following units at the envelope manufacturing plant, located at 6302 Churchman Bypass, Indianapolis, Indiana 46203, are classified as registered:

(a) Three (3) flexographic printing presses, identified as #10VH5, #11VH5, and #12VH5, installed in 1996, 1997, and 1996, respectively, each with a maximum line speed of 1500 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(b) Two (2) flexographic printing presses, identified as #2VHREG and #6VHREG, both installed in 1979, each with a maximum line speed of 1400 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(c) Seven (7) flexographic printing presses, identified as #09VHREG, installed in 2001, #01VHOUT, #02VHOUT, #03VHOUT, #04VHOUT, #07VHOUT, and #08VHOUT, installed in 1979, each with a maximum line speed of 1400 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(d) Three (3) flexographic printing presses, identified as #01RAWEB, #02RAWEB, and #03RAWEB, all installed in 1979, each with a maximum line speed of 700 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(e) Six (6) flexographic printing presses, identified as #01RO, #02RO, #03RO, #01WD38, #02WD38, and #03WD38, installed in 1991, 1986, 1995, 1987, 1979, and 1999, respectively, each with a maximum line speed of 1000 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(f) Two (2) flexographic printing presses, identified as #04WD38 and #05WD38, both installed in 2002, each with a maximum line speed of 600 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(g) One (1) parts washer, installed in 1990, with a maximum capacity of ten (10) gallons, recirculating, using no control, and exhausting to the atmosphere.

(h) One (1) plate making machine, installed in 2003, with a maximum operating capacity of forty-five (45) plates per day, using no solvents, and exhausting to the atmosphere.

(i) Two (2) envelope manufacturing machines, installed in 2002, each with a maximum capacity of 68,750 envelopes per hour, using no controls, and exhausting to the atmosphere.

(j) Nine (9) envelope manufacturing machines, four (4) installed in 1979, one (1) installed in 1986, one (1) installed in 1987, one (1) installed in 1991, one (1) installed in 1995, and one (1) installed in 1999, each with a maximum capacity of 36,000 envelopes per hour, using no controls, and exhausting to the atmosphere.

(k) Twelve (12) envelope manufacturing machines, eight (8) installed in 1979, one (1) installed in 1992, two (2) installed in 1996, and one (1) installed in 1997, each with a maximum capacity of 68,750 envelopes per hour.

The following conditions shall be applicable:

Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 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).

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirement;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere. ...

This registration is issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to OAQ and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by:
John B. Chavez
Administrator

aco

cc: File, Marion County
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oliger

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	**MeadWestvaco Corporation**
Address:	**6302 Churchman Bypass**
City:	**Indianapolis, Indiana 46203**
Authorized individual:	**Steve Degenhardt**
Phone #:	**(317) 787-4720**
Registration #:	**097-18627-0030**

I hereby certify that MeadWestvaco Corporation is still in operation and is in compliance with the requirements of Registration 097-18627-00030.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	MeadWestvaco Corporation
Source Location:	6302 Churchman Bypass, Indianapolis, Indiana 46203
County:	Marion
SIC Code:	2677
Operation Permit No.:	097-18627-00030
Permit Reviewer:	Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from MeadWestvaco Corporation relating to the operation of an envelope manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

(a) Three (3) flexographic printing presses, identified as #10VH5, #11VH5, and #12VH5, installed in 1996, 1997, and 1996, respectively, each with a maximum line speed of 1500 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(b) Two (2) flexographic printing presses, identified as #2VHREG and #6VHREG, both installed in 1979, each with a maximum line speed of 1400 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(c) Seven (7) flexographic printing presses, identified as #09VHREG, installed in 2001, #01VHOUT, #02VHOUT, #03VHOUT, #04VHOUT, #07VHOUT, and #08VHOUT, installed in 1979, each with a maximum line speed of 1400 feet per minute, and a maximum print width of 8.75 inches, using no control, and exhausting to the atmosphere.

(d) Three (3) flexographic printing presses, identified as #01RAWEB, #02RAWEB, and #03RAWEB, all installed in 1979, each with a maximum line speed of 700 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(e) Six (6) flexographic printing presses, identified as #01RO, #02RO, #03RO, #01WD38, #02WD38, and #03WD38, installed in 1991, 1986, 1995, 1987, 1979, and 1999, respectively, each with a maximum line speed of 1000 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(f) Two (2) flexographic printing presses, identified as #04WD38 and #05WD38, both installed in 2002, each with a maximum line speed of 600 feet per minute, and a maximum print width of 13 inches, using no control, and exhausting to the atmosphere.

(g) One (1) parts washer, installed in 1990, with a maximum capacity of ten (10) gallons, recirculating, using no control, and exhausting to the atmosphere.

(h) One (1) plate making machine, installed in 2003, with a maximum operating capacity of forty-five (45) plates per day, using no solvents, and exhausting to the atmosphere.

(i) Two (2) envelope manufacturing machines, installed in April 2003, each with a maximum capacity of 68,750 envelopes per hour, using no controls, and exhausting to the atmosphere.

(j) Nine (9) envelope manufacturing machines, four (4) installed in 1979, one (1) installed in 1986, one (1) installed in 1987, one (1) installed in 1991, one (1) installed in 1995, and one (1) installed in 1999, each with a maximum capacity of 36,000 envelopes per hour, using no controls, and exhausting to the atmosphere.

(k) Twelve (12) envelope manufacturing machines, eight (8) installed in 1979, one (1) installed in 1992, two (2) installed in 1996, and one (1) installed in 1997, each with a maximum capacity of 68,750 envelopes per hour.

Existing Approvals

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

(a) OP 00030, issued on May 31, 1987; and

(b) MSOP M097-17475-00030, issued on October 31, 2003.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation 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 application for the purposes of this review was received on January 15, 2004.

Emission Calculations

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

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a

stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.@

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO_2	negligible
VOC	14.32
CO	negligible
NO_x	negligible
Single HAP	negligible
Combination of HAPs	negligible

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than five (5) tons per year and less than twenty-five (25) tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is registered and subject to the provisions of 326 IAC 2-5.1-2.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of the Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 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.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	negligible
PM10	negligible
SO_2	negligible
VOC	14.32
CO	negligible
NO_x	negligible
Single HAP	negligible
Combination of HAPs	negligible

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

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Because this source does not use rotogravure printing, 40 CFR Part 60 Subpart QQ does not apply to the facility. Because the source does not have a coating line used in the manufacture of pressure sensitive tape and label materials, CFR Part 60 Subpart RR does not apply to the facility.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

(1) Because this source is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK and 40 CFR Part 63 Subpart JJJJ do not apply to the facility, despite the operation of a wide-web flexographic printing press.

(2) This source is not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP), 326 IAC 14, 40 CFR Part 63, Subpart T, because the parts washer does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,-trichloroethane, carbon tetrachloride, or chloroform in a total concentration greater than five (5) percent by weight, as a cleaning and/or drying agent.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, and construction occurred before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

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 ten (10) tons per year of VOC and is located in Marion County. 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 April 15 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 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-1(Nonattainment Area Limitations)

This rule does not apply to this source because actual emissions of particulate are less than ten tons per year, and the potential to emit of particulate is less than one hundred (100) tons per year, and it is not a specifically listed source in 326 IAC 6.

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

This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. None of the activities at this source produce particulate emissions. Therefore, 326 IAC 6-3 does not apply to these facilities.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

MeadWestvaco has no individual facility with the potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

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

Mead Westvaco has source wide potential to emit of VOC of less than twenty-five (25) tons per year, and actual source wide emissions of less than fifteen (15) pounds per day. Therefore, 8-2-5 does not apply.

326 IAC 8-3-2 (Cold Cleaner Operation)

This rule applies to the source because the parts washer was installed after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation) the owner or operator of this cold cleaning facility shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirement;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

This rule does not apply to this source because the parts washer has a remote solvent reservoir.

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

MeadWestvaco Corporation has no individual facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-5-5 does not apply.

Conclusion

The operation of this envelope manufacturer shall be subject to the conditions of the attached proposed Registration 097-18627-00030.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Mead Westvaco Corporation
Address City IN Zip: 6302 Churchman Bypass, Indianapolis, Indiana 46203
CP: 097-18627-00030
Reviewer: Angelique Oliger
Date: January 23, 2004

THROUGHPUT

Press I.D.	Maximum Line Speed (ft/min)	Maximum Print Width (in)	Throughput (MMin^2/yr)
#10VH5	1500	8.75	9460.8
#11VH5	1500	8.75	9460.8
#12VH5	1500	8.75	9460.8
#2VHREG	1400	8.75	8830.08
#6VHREG	1400	8.75	8830.08
#09VHREG	1400	8.75	8830.08
#01VHOUT	1400	8.75	8830.08
#03VHOUT	1400	8.75	8830.08
#04VHOUT	1400	8.75	8830.08
#05VHOUT	1400	8.75	8830.08
#07VHOUT	1400	8.75	8830.08
#08 VHOUT	1400	8.75	8830.08
#01RAWEB	700	13	4415.04
#02RAWEB	700	13	4415.04
#03RAWEB	700	13	4415.04
#01RO	1000	13	6307.2
#02RO	1000	13	6307.2
#03RO	1000	13	6307.2
#01WD38	1000	13	6307.2
#02WD38	1000	13	6307.2
#03WD38	1000	13	6307.2
#04WD38	600	13	3784.32
#05WD38	600	13	3784.32
Total			**166510.08**

(1) Throughput = (line speed) ft/min * 12 in / ft * (print width) in * 60 min/hr * 8760 hrs/yr * 1 MMin^2 / 1e6 in^2 = MMin^2/yr

PTE for VOCs

Compound Name (Compound with highest VOC content)	Maximum Coverage (lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Potential to Emit (tons/yr) (2)
water ink	2.8	4.47%	100.00%	10.42

VOC (tons/yr)	
All Presses	**10.42**
VOC (lbs/day)	
All Presses	57.10

(2) PTE (tons/yr) = (Maximum Coverage) lbs/MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off % * (Throughput) Mmin^2/yr * 1 ton / 2000 lbs

Appendix A: Emissions Calculations
Parts Washer and Envelope Machines

Company Name: Mead Westvaco Corporation
Address City IN Zip: 6302 Churchman Bypass, Indianapolis, Indiana 46203
CP: 097-18627-00030
Reviewer: Angelique Oliger
Date: January 23, 2004

PTE for Parts Washer

Maximum Usage: 30 gallons / month
VOC content: 100 percent
Density: 6.8 lbs / gallon

30 gal/ mon * 12 mon / yr * 100% VOC * 6.8 lbs / gal * 1 ton / 2000 lbs = **1.2 tons VOC / yr**

PTE for Envelope Machines

2002 Usage (6,240 hrs): 51.2 tons WB3324
19.6 tons XR6497

Maximum Usage (8760 hrs): 71.9 tons WB3324
27.5 tons XR6497

(Maximum Usage = 2002 Usage * 8760 hrs / 6240 hrs)

adhesive	tons used in 2002	operating hrs in 2002	Number of Machines in 2002*	% VOC by weight	PTE of VOC (tons per year)
WB3324	51.2	6240	9	2.55%	1.83
XR6497	19.6	6240	9	3.16%	0.87
Total					**2.70**