



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Colwell, Inc in NobleCounty

Significant Source Modification No.: 113-42975-00019

Significant Permit Modification No.: 113-43021-00019

The Indiana Department of Environmental Management (IDEM) has received an application from Colwell, Inc. located at 2605 Marion Drive, Kendallville, Indiana 46755, for a significant modification of its Part 70 Operating Permit issued on May 1, 2018. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Colwell, Inc. to make certain changes at its existing source. Colwell, Inc. has applied to construct and operate two (2) new deposit presses, remove a roll coating line and a Heidelberg GTO press and the incorporation of an existing press in the permit.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Kendallville Public Library
221 South Park Ave
Kendallville, Indiana 46755

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 113-42975-00019 and SPM 113-43021-00019 in all correspondence.

Comments should be sent to:

Wilfredo de la Rosa
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Wilfredo de la Rosa or (317) 232-8422
Or dial directly: (317) 232-8422
Fax: (317) 232-6749 attn: Wilfredo de la Rosa
E-mail: wdelaros@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Wilfredo de la Rosa or my staff at the above address.



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



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Governor

Bruno L. Pigott
Commissioner

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Mr. Nick Mathis
Colwell, Inc.
P.O. Box 308
Kendallville, Indiana 46755

Re: 113-43021-00019
Significant Permit Modification

Dear Mr. Mathis:

Colwell, Inc. was issued Part 70 Operating Permit Renewal No. T113-39362-00019 on May 1, 2018 for a stationary paper coating and offset printing presses producing paint chips and stripe cards operation located at 2605 Marion Drive, Kendallville, Indiana 46755. An application requesting changes to this permit was received on June 17, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart JJJJ, NESHAP: Paper and Other Web Coating.

Previously issued approvals for this source containing this attachment are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Wilfredo de la Rosa, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-8422 or (800) 451-6027, and ask for Wilfredo de la Rosa or (317) 232-8422.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Noble County
Noble County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Part 70 Operating Permit (Renewal) OFFICE OF AIR QUALITY

**Colwell, Inc.
2605 Marion Drive
Kendallville, Indiana 46755**

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

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

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

Operation Permit No.: T 113-39362-00019	
Master Agency Interest ID.: 48321	
Issued by: Original signed by: Josiah K. Balogun, Section Chief Permits Branch, Office of Air Quality	Issuance Date: May 1, 2018 Expiration Date: May 1, 2023

Minor Source Modification No. 113-42292-00019, issued on January 10, 2020.
Administrative Amendment No. 113-42316-00019, issued on January 10, 2020

Significant Permit Modification No.: 113-43021-00019	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: May 1, 2023

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Attachment A: NESHAP Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary paper coating and offset printing presses producing paint chips and stripe cards.

Source Address:	2605 Marion Drive, Kendallville, Indiana 46755
General Source Phone Number:	(260) 347 3900
SIC Code:	2752 (paint chip and stripe card manufacturing) 2796 (plate making)
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
 - (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - (2) one (1) curing oven, for lines S-1, S -2, and S-3, constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

- (b) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.
- (c) One (1) inkjet printer, identified as G-1, constructed in 2019, with a maximum capacity of 900 square feet per hour, using no control, and exhausting outdoors.
- (d) Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, using a regenerative thermal oxidizer, RTO-1 as control, and exhausting to stack/vent ID #RTO-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Pigment and base paint dispensing system

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- (b) Five (5) offset lithographic presses
 - (1) Heidelberg 4-colorspeedmaster press CPC,
 - (2) Heidelberg 5-colorspeedmaster press, constructed in 1981,
 - (3) Heidelberg 2-color press, and
 - (4) Heidelberg 1-color press.
 - (5) One (1) Heidelberg 5-color sheet-fed press, constructed in 2010, permitted in 2020, with a maximum throughput of 3.054 pounds of ink and varnish combined per hour, uncontrolled and exhausting indoors.
- (c) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months. Including one (1) 15 gallon capacity parts washer utilizing 100% VOC solvent. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

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

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SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T113-39362-00019, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

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

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

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

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

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

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

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- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office 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 Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the

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Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T113-39362-00019 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCM 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCM 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 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 or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(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(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a

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certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ 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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.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.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

-
- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
 - (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated

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repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ 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.12 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.14 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]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists

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independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 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 applicable standards for recycling and emissions reduction.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
 - (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - (2) one (1) curing oven, for lines S-1, S-2, and S-3, constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

- (b) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.
- (d) Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, using a regenerative thermal oxidizer, RTO-1 as control, and exhausting to stack/vent ID #RTO-1.

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-5][326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from Lines S-1, S-2, and S-3, or an equivalent emissions limit or overall control efficiency.
- (b) The content limits above do not apply to any clean up solvent used in Lines S-1, S-2, and S-3.

D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The VOC emissions from lines S-1, S-2, and S-3, Can Washer, and the two (2) deposit presses, Line 4(DP-1) & Line 5(DP-2), after controls shall not exceed 235 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, shall limit the potential to emit VOC emissions from lines S-1, S-2, S-3, Can Washer, and the two (2) deposit presses, Line 4(DP-1) & Line 5(DP-2), and all other process at the source to less than 250 tons VOC per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6 (New facilities; general reduction requirements)]

Pursuant to 326 IAC 8-1-6 and Significant Source Modification No. 113-42975-00019, the Best Available Control Technology (BACT) for the two (2) deposit presses identified as Line 4(DP-1) and Line 5(DP-2)

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shall be as follows:

- (a) The exhaust of the new deposit presses shall be vented to the existing Regenerative Thermal Oxidizer, identified as RTO-1 with a minimum of 98% destruction efficiency for VOC.
- (b) Good work practices shall be performed, such as the following:
 - (1) Transport VOC containing materials in closed containers;
 - (2) Store inks, solvents and other VOC containing materials in sealed containers;
 - (3) Use plunger cans, squeeze bottle or similar apparatus to apply VOC containing solvents to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing materials in spring-loaded closed containers.
 - (5) Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance or clean-up.

D.1.4 Best Available Control Technology (BACT) [326 IAC 8-1-6 (New facilities; general reduction requirements)]

Pursuant to 326 IAC 8-1-6 and Significant Source Modification No. 113-42975-00019, the Best Available Control Technology (BACT) for the enclosed Can Washer shall be as follows:

- (a) The enclosure system shall be operated to meet the criteria for Total Closure, as per USEPA Method 204.
- (b) The captured emissions shall be ducted to the existing Regenerative Thermal Oxidizer, identified as RTO-1 that is operated to achieve a VOC destruction efficiency of at least 98 percent, on a rolling 3-hour average.
- (c) The Permittee shall implement the following work practices to reduce VOC emission from the Can Washer:
 - (1) Transport VOC containing material in closed container.
 - (2) Store solvents and other VOC containing material in sealed containers;
 - (3) Use plunger cans, squeeze bottles or similar apparatus to apply VOC containing solvent to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing material in spring-loaded closed containers;
 - (5) Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - (6) Drain parts until dripping ceases before removal from a unit;
 - (7) Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 36 inches, whichever is less; and
 - (8) Operate the unit without heating the solvent above ambient room temperature.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and in order to achieve compliance with D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall operate the regenerative thermal oxidizer RTO-1, at all times the Can Washer is in operation and lines S-1, S-2, S-3, Line 4(DP-1) and Line 5(DP-2) are in operation and using non-compliant coatings.

D.1.8 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-5][326 IAC 8-1-2]

In order to comply with Condition D.1.1, the Permittee shall calculate the equivalent VOC emissions using the following equation:

- (a) When using non-compliant coatings the Permittee shall operate the thermal oxidizer RTO-1 at all times that coating lines S-1, S-2, and S-3, are operating and the equivalent emissions, expressed as pounds of VOC per gallon of coating solids shall be calculated as follows as described in 326 IAC 8-1-2(b):

$$E = L / (1 - L/D)$$

Where:

- L = Applicable emission limit from 326 IAC 8-2-5 in pounds of VOC per gallon of coating (2.9)
D = Baseline solvent density of VOC in the coating in pounds of VOC per gallon of solvent (7.36)
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of the coating operations using the compliance methods in 326 IAC 8-1-2(a).

A solvent density of seven and thirty-six hundredth (7.36) pounds of VOC per gallon of coating has been used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit.

- (b) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer, RTO-1, shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = the actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content, as applied to the coating lines as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallons of coating solids as applied;
E = 4.79 pounds per gallon of solids; and
O = equivalent overall efficiency of the capture system and control device as a percentage.

D.1.9 Volatile Organic Compounds (VOC)

In order to comply with Condition D.1.2, the Permittee shall calculate the VOC emissions using the following equation:

Total VOC emitted (tons/month) =

$$[(\text{VOC input})/\text{month} \times (1 - \text{Ctrl efficiency}) \times (\text{C. efficiency})] + \text{C. coatings VOC content}/\text{month}$$

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Where:

VOC input = Total VOC input from non-compliant coatings to lines S-1 + S-2 + S-3 + S-4 (tons/month) added to the total VOC input to the Can Washer (tons/month)

Ctrl efficiency = Percent RTO-1 control efficiency determined from the most recent valid stack test as required in Conditions D.1.3 and D.1.4.

C. efficiency = Percent capture efficiency

C. coatings VOC content = Total VOC content from compliant coatings (tons/month)

D.1.10 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall perform VOC testing of the RTO-1 utilizing methods as approved by the Commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.11 Parametric Monitoring - RTO [40 CFR Part 64]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3 and D.1.4.
- (b) The duct pressure shall be observed at least once per day when the RTO is in operation. On and after the date the stack test results are available, the duct pressure shall be maintained within the normal range as established in latest compliant stack test.
- (c) When, for any one reading, the duct pressure is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (d) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.12 RTO Temperature [40 CFR Part 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the RTO for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature established during the latest stack test that demonstrated compliance.
- (b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test.
- (d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour

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average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.13 Record Keeping Requirement

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- (a) To document the compliance status with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1 and D.1.2.
- (1) The VOC content of each coating and solvent, as applied.
 - (2) The total VOC input from non-compliant coatings to lines S-1, S-2, and S-3, the Can Washer, and the deposit presses Line 4(DP-1) and Line 5(DP-2) on a monthly basis.
 - (A) Records shall include purchase orders, invoices, or volume used.
 - (B) Safety data sheets (SDS) necessary to verify the following as applicable
 - (C) Type of coating or solvent
 - (D) The density or specific gravity.
 - (E) The weight percent of total volatiles, water, solids, and exempt solvents.
 - (3) The total VOC input from compliant coatings to lines S-1, S-2, and S-3, the Can Washer, and the deposit presses Line 4(DP-1) and Line 5(DP-2) on a monthly basis.
 - (A) Records shall include purchase orders, invoices, or volume used.
 - (B) Safety data sheets (SDS) necessary to verify the following as applicable
 - (C) Type of coating or solvent
 - (D) The density or specific gravity.
 - (E) The weight percent of total volatiles, water, solids, and exempt solvents.
 - (F) The dates and times compliant coatings are used.
 - (4) The total VOC emitted for each month and each compliance period.
- (b) To document the compliance status with Condition D.1.9 (Parametric Monitoring - RTO), the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizer, RTO-1. The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day, dates and times that compliant coatings are used).
- (c) To document the compliance status with Condition D.1.10 (RTO Temperature), the Permittee shall maintain continuous temperature records for the regenerative thermal oxidizer, RTO-1 and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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D.1.14 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months. Including one (1) 15 gallon capacity parts washer, constructed after 1991 utilizing 100% VOC, non-HAP solvent. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

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D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

NESHAP

Emissions Unit Description:

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
- (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - (2) one (1) curing oven, for lines S-1, S -2, and S-3, , constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJJJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ][326 IAC 20-65]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-65, for the emission units listed above:

- (1) 40 CFR 63.3290
- (2) 40 CFR 63.3300, except for (a) through (g)
- (3) 40 CFR 63.3310
- (4) 40 CFR 63.3320(a), (b)(1-3), and (c)
- (5) 40 CFR 63.3321(a)
- (6) 40 CFR 63.3330(a)
- (7) 40 CFR 63.3340
- (8) 40 CFR 63.3350
- (9) 40 CFR 63.3360

- (10) 40 CFR 63.3370
- (11) 40 CFR 63.3400
- (12) 40 CFR 63.3410
- (13) Table 1 40 CFR 63, Subpart JJJJ
- (14) Table 2 40 CFR 63, Subpart JJJJ

E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In order to demonstrate compliance with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart JJJJ, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Colwell, Inc.
Source Address: 2605 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-39362-00019

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Colwell, Inc.
Source Address: 2605 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-39362-00019

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Colwell, Inc.
Source Address: 2605 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-39362-00019
Facility: Lines S-1, S-2, S-3, S-4, Can Washer, Line 4(DP-1) and Line 5(DP-2)
Parameter: VOC Emissions
Limit: The VOC emissions shall be limited to less than 235 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Colwell, Inc.
 Source Address: 2605 Marion Drive, Kendallville, Indiana 46755
 Part 70 Permit No.: T113-39362-00019

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Significant Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Colwell, Inc.
Source Location:	2605 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752 (Commercial Printing, Lithographic) 2796 (Platemaking and Related Services)
Operation Permit No.:	T 113-39362-00019
Operation Permit Issuance Date:	May 1, 2018
Significant Source Modification No.:	113-42975-00019
Significant Permit Modification No.:	113-43021-00019
Permit Reviewer:	Wilfredo de la Rosa

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 113-39362-00019 on May 1, 2018. The source has since received the following approvals:

- (a) Minor Source Modification No. 113-42292-00019, issued on January 10, 2020; and
- (b) Administrative Amendment No. 113-42316-00019, issued on January 10, 2020.

County Attainment Status

The source is located in Noble County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Noble 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.

- (b) **PM_{2.5}**
 Noble County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Noble County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Modification (ton/year)								Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	
Total PTE of Entire Source Excluding Fugitive Emissions*	0.13	0.52	0.52	0.04	6.78	247.88	5.70	91.18 Toluene	147.53

	Source-Wide Emissions Prior to Modification (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.
- (c) These emissions are based on the TSD of Minor Source Modification No. 113-42292-00019, issued on January 10, 2020.

**Emission Units and Pollution Control Equipment
 Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)**

As part of this permitting action, the source requested to add the following existing emission unit constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):

- (a) One (1) Heidelberg 5-color sheet-fed press, constructed in 2010, with a maximum throughput of 3.054 pounds of ink and varnish combined per hour, uncontrolled and exhausting indoors.

The total potential to emit of the emission unit is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the modification approval requirements under 326 IAC 2-7-10.5, including the requirement to submit an application, do not apply to the emission unit. See Appendix A of this Technical Support Document for detailed emission calculations.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Colwell, Inc. on June 17, 2020, relating to the construction of two (2) new deposit presses; removal of the roll coating application line S-4; removal of Heidelberg GTO press and addition of an existing Heidelberg 5-color press in the permit.

The following is a list of the new emission units and pollution control device:

- (a) Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, controlled by a regenerative thermal oxidizer, identified as RTO-1, and exhausting to stack/vent ID #RTO-1.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								Total HAPs
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	
Line 4(DP-1) deposit press	-	-	-	-	-	384.10	-	300.59 Xylene	709.60
Line 5(DP-2) deposit press	-	-	-	-	-	384.10	-	300.59 Xylene	709.60
Total PTE Before Controls of the New Emission Units:	-	-	-	-	-	768.20	-	601.18 Xylene	1419.20

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

- (a) Approval to Construct
 Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at equal to or greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit equal to or greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

- (b) Approval to Operate
 Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70

source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	Project Emissions (ton/year)						
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO
Line 4(DP-1) deposit press	-	-	-	-	-	<250	-
Line 5(DP-2) deposit press	-	-	-	-	-		-
Total for Modification	-	-	-	-	-	<250	-
PSD Major Source Thresholds	250	250	250	250	250	250	250
¹ PM _{2.5} listed is direct PM _{2.5} .							

The source opted to take VOC limits in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limits.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source after Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

The source requested to revise the VOC limit to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for the existing Lines S-1 through S-3 and the Can Washer together with the new deposit presses Line 4(DP-1) and Line 5(DP-2). Line 4 and one (1) lithographic press were also removed from the permit. Deletions are shown as strikethrough texts and new ones in bold texts.

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³ (Toluene)	Total HAPs
Lines S-1, S-2 and S-3	-	-	-	-	-	240.00 235.00	-	63.83	99.86
Line-4	-	-	-	-	-		-	25.55	42.55
Can Washer	-	-	-	-	-		-	0.66	0.66
Two (2) New Deposit Presses, Line4(DP-1) and Line 5(DP-2)	-	-	-	-	-		-	2.70	70.96
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.00	0.13
Offset Lithographic Presses	-	-	-	-	-	3.60 3.58	-	4.06 1.04	2.57 2.55
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	1.00	2.50

Source-Wide Emissions After Issuance (ton/year)									
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³ (Toluene)	Total HAPs
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	0.07	1.78
Total PTE of Entire Source Excluding Fugitives*	0.13	0.52	0.52	0.04	6.78	247.88 246.29	5.70	91.18 69.32	147.53 178.45
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP *Fugitive HAP emissions are always included in the source-wide emissions.									

The table below summarizes the potential to emit of the entire source after issuance of this modification, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Source-Wide Emissions After Issuance (ton/year)									
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³ (Toluene)	Total HAPs
Lines S-1, S-2 and S-3						235.00		63.83	99.86
Can Washer								0.66	0.66
Two (2) New Deposit Presses, Line 4(DP-1) and Line 5(DP-2)								2.70	70.96
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.00	0.13
Offset Lithographic Presses	-	-	-	-	-	3.58	-	1.04	2.55
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	1.00	2.50
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	0.07	1.78
Total PTE of Entire Source Excluding Fugitives*	0.13	0.52	0.52	0.04	6.78	246.29	5.70	69.32	178.45

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³ (Toluene)	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

- (a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.
- (b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF, are still not included in the permit for the two (2) new deposit presses and the new Heidelberg 5-color sheet-fed press because they are not a rotogravure printing line used to print or coat flexible vinyl or urethane products.
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK are still not included in the permit for the new deposit presses and the new Heidelberg 5-color sheet-fed press. The presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ and 326 IAC 20-65 are not included in the permit for the new deposit presses and the Heidelberg 5-color sheet-fed press, since printing is not done on a web or continuous substrate but on individual paper sheet only.

- (c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved.
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Line 4(DP-1)/VOC	RTO	326 IAC 2-2	>100	<100	Y	N
Line 5(DP-2)/VOC	RTO	326 IAC 2-2	>100	<100	Y	N
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.						
Controls: RTO = Regenerative or Recuperative Thermal Oxidizer						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to the two (2) deposit presses, Line 4(DP-1) and Line 5(DP-2) that are subject for VOC. A CAM plan was submitted as part of a previous permit application and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements. The submitted CAM plan will also be applicable to the new deposit presses, Line 4 DP-1 and Line 5 DP-2.

State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

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

The source is not one (1) of the twenty-eight source categories and the source-wide potential to emit VOC emissions is greater than the PSD applicability of two hundred fifty (250) tons per year. However, the source has opted to take a VOC usage limit on Lines S-1, S-2, and S-3, the Can Washer, and the deposit presses, Line 4(DP-1) and Line 5(DP-2) to limit source-wide VOC emissions to less than the PSD threshold level and rendering the requirements 326 IAC 2-2 (PSD) not applicable to the source.

PSD Minor Source Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The VOC emissions from the Lines S-1, S-2, and S-3, the Can Washer, and the deposit presses, Line 4(DP-1) and Line 5(DP-2) shall not exceed 235 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source.

Note: The existing PSD Minor Limit for VOC has been reduced from 240 tons per year to 235 tons per year as requested by the source.

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

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of the two (2) new deposit presses, approved in 2020 for construction will emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the deposit presses. However, pursuant to 326 IAC 2-4.1-1(b)(2), because the deposit presses are exempt from regulation under NESHAP 40 CFR 63, Subpart JJJJ which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, the two (2) new deposit presses are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (a) Even though, the new Heidelberg 5-color sheet-fed press was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

- (b) The two (2) new deposit presses are subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year each, and the two (2) new deposit presses are not regulated by other rules in 326 IAC 8. Therefore, a Best Available Control Technology (BACT) analysis was required for the two (2) new deposit presses. (see Appendix B of this TSD).

Note: The existing Can Washer will also be included in the BACT analysis to correct the after-control minor limit that was previously established in the permit.

According to the BACT analysis contained in Appendix B of this TSD, IDEM, OAQ has determined that the following requirements represent BACT for the two (2) new deposit presses and the Can Washer:

Two (2) new deposit presses, Line 4(DP-1) and Line 5(DP-2)

- (a) The exhaust of the new deposit presses shall be vented to the existing Regenerative Thermal Oxidizer, identified as RTO-1 with a minimum of 98% destruction efficiency for VOC.
- (b) Good work practices shall be performed, such as the following:
- (1) Transport VOC containing materials in closed containers;
 - (2) Store inks, solvents and other VOC containing materials in sealed containers;
 - (3) Use plunger cans, squeeze bottle or similar apparatus to apply VOC containing solvents to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing materials in spring-loaded closed containers.
 - (5) Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance or clean-up.

Can Washer

- (a) The enclosure system shall be operated to meet the criteria for Total Closure, as per USEPA Method 204.
- (b) The captured emissions shall be ducted to the existing Regenerative Thermal Oxidizer, identified as RTO-1 that is operated to achieve a VOC destruction efficiency of at least 98 percent, on a rolling 3-hour average.
- (c) The Permittee shall implement the following work practices to reduce VOC emission from the Can Washer:
- (1) Transport VOC containing material in closed container.
 - (2) Store solvents and other VOC containing material in sealed containers;
 - (3) Use plunger cans, squeeze bottles or similar apparatus to apply VOC containing solvent to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing material in spring-loaded closed containers;
 - (5) Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - (6) Drain parts until dripping ceases before removal from a unit;
 - (7) Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 36 inches, whichever is less; and
 - (8) Operate the unit without heating the solvent above ambient room temperature.

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

The requirements of 326 IAC 8-2-5 (Paper Coating Operations) are not applicable to the two (2) new deposit presses and the new Heidelberg 5-color sheet-fed press since they are not web coating operations nor saturation processes of paper, plastic metal foil, and pressure sensitive tape and labels regardless of substrate.

326 IAC 8-16 (Offset Lithography Printing and Letterpress Printing)

The new Heidelberg 5-color sheet-fed press is not subject to the requirements of 326 IAC 8-16 since it is not located in Lake or Porter County.

Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this modification

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. The following changes listed below are due to the proposed modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text (these changes may include Title I changes):

Change 1: Sections A.2 and A.3 have been amended to incorporate the new emission units and applicable rules:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
 - (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - (2) ~~one (1) rollcoating paper coating application system, identified as line S-4, constructed in 1998, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour; and~~
 - (3) **2** one (1) curing oven, for lines S-1, S -2, **and** S-3, ~~and S-4~~, constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

- (b) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.
- (c) One (1) inkjet printer, identified as G-1, constructed in 2019, with a maximum capacity of 900 square feet per hour, using no control, and exhausting outdoors.
- (d) **Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, using a regenerative thermal oxidizer, RTO-1 as control, and**

exhausting to stack/vent ID #RTO-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Pigment and base paint dispensing system
- (b) Five (5) offset lithographic presses
 - (1) Heidelberg 4-colorspeedmaster press CPC,
 - (2) Heidelberg 5-colorspeedmaster press, constructed in 1981,
 - (3) Heidelberg 2-color press,
 - (4) Heidelberg 1-color press. and
 - (5) ~~Heidelberg GTO press.~~
 - (5) One (1) Heidelberg 5-color sheet-fed press, constructed in 2010, permitted in 2020, with a maximum throughput of 3.054 pounds of ink and vanish combined per hour, uncontrolled and exhausting indoors.**
- (c) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months. Including one (1) 15 gallon capacity parts washer utilizing 100% VOC solvent. [326 IAC 8-3-2][326 IAC 8-3-8]

Change 2: Section D.1 has been amended to incorporate the new emission units as well as the new and modified applicable rules. The VOC limit to render 326 IAC 8-1-6 not applicable would have been corrected to make it before controls. However, the source decided to remove the limit and undergo BACT analysis for the Can Washer and the new deposit presses instead.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
 - (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - (2) ~~one (1) rollcoating paper coating application system, identified as line S-4, constructed in 1998, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour; and~~
 - (3 2) one (1) curing oven, for lines S-1, S -2, and S-3, and S-4, constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.**

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

- (b) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.
- (d) **Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, using a regenerative thermal oxidizer, RTO-1 as control, and exhausting to stack/vent ID #RTO-1.**

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-5][326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from Lines S-1, S-2, **and S-3, S-4** or an equivalent emissions limit or overall control efficiency.
- (b) The content limits above do not apply to any clean up solvent used in Lines S-1, S-2, **and S-3, S-4**

D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The VOC emissions from lines S-1, S-2, **and S-3, S-4** and Can Washer, **and the two (2) deposit presses, Line 4(DP-1) & Line 5(DP-2), after controls** shall not exceed ~~240~~ **235** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, shall limit the potential to emit VOC emissions from lines S-1, S-2, S-3, ~~S-4~~ and Can Washer, **and the two (2) deposit presses, Line 4(DP-1) & Line 5(DP-2)**, and all other process at the source to less than 250 tons VOC per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6 (New facilities; general reduction requirements)]

Pursuant to 326 IAC 8-1-6 and Significant Source Modification No. 113-42975-00019, the Best Available Control Technology (BACT) for the two (2) deposit presses identified as Line 4(DP-1) and Line 5(DP-2) shall be as follows:

- (a) **The exhaust of the new deposit presses shall be vented to the existing Regenerative Thermal Oxidizer, identified as RTO-1 with a minimum of 98% destruction efficiency for VOC.**
- (b) **Good work practices shall be performed, such as the following:**
 - (1) **Transport VOC containing materials in closed containers;**
 - (2) **Store inks, solvents and other VOC containing materials in sealed containers;**
 - (3) **Use plunger cans, squeeze bottle or similar apparatus to apply VOC containing solvents to clean-up rags;**
 - (4) **Store used rags from any manual cleaning operations that use VOC containing materials in spring-loaded closed containers.**

- (5) Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance or clean-up.

D.1.4 Best Available Control Technology (BACT) [326 IAC 8-1-6 (New facilities; general reduction requirements)]

Pursuant to 326 IAC 8-1-6 and Significant Source Modification No. 113-42975-00019, the Best Available Control Technology (BACT) for the enclosed Can Washer shall be as follows:

- (a) The enclosure system shall be operated to meet the criteria for Total Closure, as per USEPA Method 204.
- (b) The captured emissions shall be ducted to the existing Regenerative Thermal Oxidizer, identified as RTO-1 that is operated to achieve a VOC destruction efficiency of at least 98 percent, on a rolling 3-hour average.
- (c) The Permittee shall implement the following work practices to reduce VOC emission from the Can Washer:
 - (1) Transport VOC containing material in closed container.
 - (2) Store solvents and other VOC containing material in sealed containers;
 - (3) Use plunger cans, squeeze bottles or similar apparatus to apply VOC containing solvent to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing material in spring-loaded closed containers;
 - (5) Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - (6) Drain parts until dripping ceases before removal from a unit;
 - (7) Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 36 inches, whichever is less; and
 - (8) Operate the unit without heating the solvent above ambient room temperature.

~~D.1.3 Volatile Organic Compound (VOC) Minor Limit [326 IAC 8-1-6]~~

~~In order to render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable, the Permittee shall comply with the following:~~

~~The VOC emissions from the Can Washer after the RTO-1 shall not exceed 5.68 lb/hr.~~

~~Compliance with this limit shall limit the potential to emit VOC emissions the Can Washer to less than twenty five (25) tons per year and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the Can Washer.~~

D.1.4-5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.5 6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and in order to achieve compliance with D.1.1, D.1.2, ~~and~~ D.1.3, **and D.1.4**, the Permittee shall operate the regenerative thermal oxidizer RTO-1, at all times the Can Washer is in operation and lines S-1, S-2, S-3, ~~and S-4~~, **Line 4(DP-1) and Line 5(DP-2)** are in operation and using non-compliant coatings.

D.1.6 8 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-5][326 IAC 8-1-2]

In order to comply with Condition D.1.1, the Permittee shall calculate the equivalent VOC emissions using the following equation:

- (a) When using non-compliant coatings the Permittee shall operate the thermal oxidizer RTO-1 at all times that coating lines S-1, S-2, **and** S-3, ~~S-4~~ are operating and the equivalent emissions, expressed as pounds of VOC per gallon of coating solids shall be calculated as follows as described in 326 IAC 8-1-2(b):

$$E = L / (1 - L/D)$$

Where:

- L = Applicable emission limit from 326 IAC 8-2-5 in pounds of VOC per gallon of coating (2.9)
D = Baseline solvent density of VOC in the coating in pounds of VOC per gallon of solvent (7.36)
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of the coating operations using the compliance methods in 326 IAC 8-1-2(a).

A solvent density of seven and thirty-six hundredth (7.36) pounds of VOC per gallon of coating has been used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit.

- (b) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer, RTO-1, shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = the actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content, as applied to the coating lines as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallons of coating solids as applied;
E = 4.79 pounds per gallon of solids; and
O = equivalent overall efficiency of the capture system and control device as a percentage.

D.1.7 9 Volatile Organic Compounds (VOC)

In order to comply with Condition D.1.2, the Permittee shall calculate the VOC emissions using the following equation:

Total VOC emitted (tons/month) =

$[(\text{VOC input})/\text{month} \times (1 - \text{Ctrl efficiency}) \times (\text{C. efficiency})] + \text{C. coatings VOC content}/\text{month}$

Where:

VOC input = Total VOC input from non-compliant coatings to lines S-1 + S-2 + S-3 + S-4 (tons/month) added to the total VOC input to the Can Washer (tons/month)

Ctrl efficiency = Percent RTO-1 control efficiency determined from the most recent valid stack test **as required in Conditions D.1.3 and D.1.4.**

C. efficiency = Percent capture efficiency

C. coatings VOC content = Total VOC content from compliant coatings (tons/month)

D.1.810 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, D.1.2, ~~and D.1.3,~~ **and D.1.4,** the Permittee shall perform VOC testing of the RTO-1 utilizing methods as approved by the Commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.911 Parametric Monitoring - RTO [40 CFR Part 64]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, ~~and D.1.3,~~ **and D.1.4.**
- (b) The duct pressure shall be observed at least once per day when the RTO is in operation. On and after the date the stack test results are available, the duct pressure shall be maintained within the normal range as established in latest compliant stack test.
- (c) When, for any one reading, the duct pressure is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (d) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.4012 RTO Temperature [40 CFR Part 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the RTO for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature established during the latest stack test that demonstrated compliance.
- (b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Condition D.1.1, D.1.2, ~~and D.1.3,~~ **and D.1.4.**
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test.

- (d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.4413 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1 and D.1.2.
- (1) The VOC content of each coating and solvent, as applied.
- (2) The total VOC input from non-compliant coatings to lines S-1, S-2, **and S-3, S-4 and the Can Washer, and the deposit presses Line 4(DP-1) and Line 5(DP-2)** on a monthly basis.
- (A) Records shall include purchase orders, invoices, or volume used.
- (B) Safety data sheets (SDS) necessary to verify the following as applicable
- (C) Type of coating or solvent
- (D) The density or specific gravity.
- (E) The weight percent of total volatiles, water, solids, and exempt solvents.
- (3) The total VOC input from compliant coatings to lines S-1, S-2, **and S-3, and S-4 the Can Washer, and the deposit presses Line 4(DP-1) and Line 5(DP-2)** on a monthly basis.
- (A) Records shall include purchase orders, invoices, or volume used.
- (B) Safety data sheets (SDS) necessary to verify the following as applicable
- (C) Type of coating or solvent
- (D) The density or specific gravity.
- (E) The weight percent of total volatiles, water, solids, and exempt solvents.
- (F) The dates and times compliant coatings are used.
- (4) The total VOC emitted for each month and each compliance period.
- (b) To document the compliance status with Condition D.1.9 (Parametric Monitoring - RTO), the Permittee shall maintain daily records of the duct pressure or fan amperage for the ~~(control device)~~ **regenerative thermal oxidizer, RTO-1**. The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day, dates and times that compliant coatings are used).
- (c) To document the compliance status with Condition D.1.10 (RTO Temperature), the

Permittee shall maintain continuous temperature records for the ~~(control device)~~ **regenerative thermal oxidizer, RTO-1** and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regards to the records required by this condition.

D.1.4214 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regards to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35).

Change 3: Section E.1 has been amended to remove the units in Line 4:

SECTION E.1

NESHAP

Emissions Unit Description:

- (a) Web coating line, controlled by a 10.0 MMBtu/hr regenerative thermal oxidizer, identified as RTO-1, constructed in 2013, with emissions exhausted at Stack/Vent ID #RTO-1, consisting of work stations and associated equipment as follows:
- (1) one (1) paper coating operation, including lines S-1, S-2, and S-3, constructed in 1989, 1996, and 1993 respectively, with a combined maximum throughput of 118 gallons of coating per hour;
 - ~~(2) one (1) rollcoating paper coating application system, identified as line S-4, constructed in 1998, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour; and~~
 - ~~(3)~~ (2) one (1) curing oven, for lines S-1, S-2, **and** S-3, **and** S-4, constructed in 1998, powered through heat recovery unit, identified as ThermJet TH1000, constructed in 2013, with a maximum heat input capacity of 5.8 MMBtu/hr from this RTO-1.

[Under NESHAP Subpart JJJJ, the web coating operation is an existing affected source.]

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

Change 4: The Part 70 Quarterly Report Form has been revised to incorporate the new units and the new limit:

Part 70 Quarterly Report

Source Name: Colwell, Inc.
Source Address: 2605 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-39362-00019
Facility: Lines S-1, S-2, S-3, S-4, and Can Washer, **Line 4(DP-1) and Line 5(DP-2)**
Parameter: VOC Emissions
Limit: The VOC emissions shall be limited to less than ~~240~~ **235** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for purposes of this review was received on June 17, 2020. Additional information was received on August 10, 2020 and August 20, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 113-42975-00019. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 113-43021-00019.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Wilfredo de la Rosa, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-8422 or (800) 451-6027, and ask for Wilfredo de la Rosa or (317) 232-8422.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Summary**

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Operating Permit No: 113-42316-00019
Significant Source Modification: 113-42975-00019
Significant Permit Modification: 113-43021-00019
Reviewer: Wilfredo de la Rosa

Uncontrolled Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single HAP (Toluene)
Lines S-1, S-2, and S-3	-	-	-	-	-	3,030	-	1,997	1,277
Can Washer	-	-	-	-	-	52.42	-	13.10	13.10
Two (2) New Deposit Presses	-	-	-	-	-	768.11	-	1419.23	53.97
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.13	0.0002
Offset Lithographic Presses	-	-	-	-	-	3.60	-	2.57	1.06
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	2.50	1.00
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	1.78	0.07
Total	0.13	0.52	0.52	0.04	6.78	3,861.96	5.70	3,436.48	1,345.91

Limited Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single
Lines S-1, S-2, and S-3	-	-	-	-	-	235.00	-	99.86	63.83
Can Washer	-	-	-	-	-		-	0.66	0.66
Two (2) New Deposit Presses	-	-	-	-	-		-	70.96	2.70
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.13	0.0002
Offset Lithographic Presses	-	-	-	-	-	3.60	-	2.57	1.06
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	2.50	1.00
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	1.78	0.07
Total	0.13	0.52	0.52	0.04	6.78	246.29	5.70	178.45	69.32

New Units - 42975

**Appendix A: Emission Calculations
Summary**

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendallville, IN 46755
Title V Operating Permit No: 113-42316-00019
Significant Source Modification: 113-42975-00019
Significant Permit Modification: 113-43021-00019
Reviewer: Wilfredo de la Rosa

Uncontrolled Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single HAP (Toluene)
Two (2) New Deposit Presses	-	-	-	-	-	768.11	-	1,419.23	53.97
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	2.50	1.00
Total	0.00	0.00	0.00	0.00	0.00	771.52	0.00	1,421.73	54.97

Limited Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single
Two (2) New Deposit Presses	-	-	-	-	-	38.41	-	70.96	2.70
One (1) New Heidelberg 5-color Press	-	-	-	-	-	3.41	-	2.50	1.00
Total	0.00	0.00	0.00	0.00	0.00	41.82	0.00	73.46	3.70

Appendix A: Emission Calculations
VOC and HAP Emission Calculations from the Deposit Presses

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendallville, IN 46755
Title V Operating Permit No: 113-42316-00019
Significant Source Modification: 113-42975-00019
Significant Permit Modification: 113-43021-00019
Reviewer: Wilfredo de la Rosa

Throughput	Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)*	Throughput (ft ² /hr)*
	DP-1	32.3	28.0	3055.8	2422
	DP-2	32.3	28.0	3055.8	2422

*Considers 53.57% of sheet is coated given deposit area information provided by client.

Ink VOCs Press ID	Coating Name	Density (lbs/gal)	Maximum Coverage Thickness (in)	Emission Factor (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	VOC PTE (tons/year)	Controlled VOC (tons/year)	
										DP-1 (Line 4)
DP-2 (Line 5)	Canlak Paperlac White 16-20" @ 60° (429-118)	9.09	0.012	472.2	66.54%	80%	3055.8	384.1	19.20	
Total VOC Emissions =									768.1	38.41

Ink HAPs Press ID	Coating Name	Density (lbs/gal)	Maximum Coverage Thickness (in)	Emission Factor (lbs/MMin ²)	Weight % HAPs	Flash Off %	Throughput (MMin ² /year)	HAPs PTE (tons/year)	Controlled HAP (tons/year)	
										DP-1 (Line 4)
DP-1 (Line 4)	Akzo Nobel Flattening Paste (233-0004PA)	8.50	0.012	441.6	10.00%	80%	3055.8	53.9718	(Toluene 108-88-3) 2.69859052	
DP-1 (Line 4)	Wetting and Dispersing Agent (62A03) (996-203A)	7.89	0.012	409.9	60.00%	80%	3055.8	300.5912	(Xylene 1330-20-7) 15.0295618	
DP-1 (Line 4)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	5.00%	80%	3055.8	28.0971	(Ethylbenzene 100-41-4) 1.40485448	
DP-1 (Line 4)	Akzo Nobel Flattening Paste (233-0004PA)	8.50	0.012	441.6	10.00%	80%	3055.8	53.9718	(MIBK 108-10-1) 2.69859052	
DP-1 (Line 4)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	0.01%	80%	3055.8	0.0478	(Styrene 100-42-5) 0.00238825	
DP-1 (Line 4)	Akzo Nobel PaperLac BT WT H ENV BEHR 20 (233-0085PA-185LM)	10.61	0.012	551.2	0.00%	80%	3055.8	0.0168	(Cumene 98-82-8) 0.00084212	
DP-1 (Line 4)	Canlak Paperlac Clear 10-2" @ 60°/30-35° @ 85° (429-011)	7.70	0.012	400.0	20.00%	80%	3055.8	97.7842	(DEHP 117-81-7) 4.88921106	
DP-1 (Line 4)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	0.06%	80%	3055.8	0.3417	(2-phenoxethanol 122-5) 0.01708303	
DP-1 (Line 4)	Akzo Nobel PaperLac BT WT H ENV BEHR 20 (233-0085PA-185LM)	10.61	0.012	551.2	0.05%	80%	3055.8	0.3032	(Naphthalene 91-20-3) 0.01515814	
DP-2 (Line 5)	Colwell Blend Regular (SD-06-26)	6.87	0.012	356.9	40.00%	80%	3055.8	174.4877	(Methanol 67-56-1) 8.72438441	
DP-2 (Line 5)	Akzo Nobel Flattening Paste (233-0004PA)	8.50	0.012	441.6	10.00%	80%	3055.8	53.9718	(Toluene 108-88-3) 2.69859052	
DP-2 (Line 5)	Wetting and Dispersing Agent (62A03) (996-203A)	7.89	0.012	409.9	60.00%	80%	3055.8	300.5912	(Xylene 1330-20-7) 15.0295618	
DP-2 (Line 5)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	5.00%	80%	3055.8	28.0971	(Ethylbenzene 100-41-4) 1.40485448	
DP-2 (Line 5)	Akzo Nobel Flattening Paste (233-0004PA)	8.50	0.012	441.6	10.00%	80%	3055.8	53.9718	(MIBK 108-10-1) 2.69859052	
DP-2 (Line 5)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	0.01%	80%	3055.8	0.0478	(Styrene 100-42-5) 0.00238825	
DP-2 (Line 5)	Akzo Nobel PaperLac BT WT H ENV BEHR 20 (233-0085PA-185LM)	10.61	0.012	551.2	0.00%	80%	3055.8	0.0168	(Cumene 98-82-8) 0.00084212	
DP-2 (Line 5)	Canlak Paperlac Clear 10-2" @ 60°/30-35° @ 85° (429-011)	7.70	0.012	400.0	20.00%	80%	3055.8	97.7842	(DEHP 117-81-7) 4.88921106	
DP-2 (Line 5)	Akzo Nobel PaperLac BrWth (233-0056PA)	8.85	0.012	459.7	0.06%	80%	3055.8	0.3417	(2-phenoxethanol 122-5) 0.01708303	
DP-2 (Line 5)	Akzo Nobel PaperLac BT WT H ENV BEHR 20 (233-0085PA-185LM)	10.61	0.012	551.2	0.05%	80%	3055.8	0.3032	(Naphthalene 91-20-3) 0.01515814	
Total HAP Emissions =									1419.2	
Total HAP DP-1									709.6	35.480664
Total HAP DP-2									709.6	35.480664
									tons/year	70.961329

METHODOLOGY

Throughput (MMin² per year) = Maximum line speed feet/minute * 12 inches/foot * Maximum print width inches * 60 minutes/hour * 8760 hours/year
 Emission Factor (lb/Mmin²) = Density (lb/gal) * Maximum Coverage Thickness (in) * 1 gal/231 in³ * 1,000,000 in² / 1 Mmin²
 VOC Emissions (Tons/Year) = Emission Factor (lbs/MMin²) * Weight % Volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash Off % * Throughput (MMin²/year) * 1 ton/2000 lbs
 NOTE: Heat set offset printing has an assumed flash off of 80%. Non-Heatset types of offset Lithographic Printers have a flash off of 5%.
 (Source -EPA Guidance, "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (9/06))

Client-provided information indicates largest sheets are 28" by 21" and contain seventy-two individual paint deposit slots measuring approximately 1.25" by 3.5" each = 315 sq. in/588 square in. or 53.57% coverage

Appendix A: Emission Calculations
VOC and HAP Emission Calculations from the Offset Presses

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Operating Permit No: 113-42316-00019
Significant Source Modification: 113-42975-00019
Significant Permit Modification: 113-43021-00019
Reviewer: Wilfredo de la Rosa

Material	Maximum Usage (lbs/hour)	Weight % VOC	Weight % Manganese Compounds	Weight % Cobalt Compounds	Weight % Naphthalene	VOC Emissions (lbs/day)	VOC Emissions (tons/yr)	Manganese Compounds Emissions (ton/yr)	Cobalt Compounds Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Highest Single HAP Emissions (ton/yr)	Total All HAPs Emissions (ton/yr)
Heidelberg 4-color												
432 Gray	0.143	21%	0.56%	0.12%	0.00%	0.73	0.13	0.004	0.001	0.000	0.004	0.005
Heidelberg 5-color												
295 Blue	0.207	21%	0.40%	0.40%	0.002%	1.04	0.19	0.004	0.004	0.000	1.00	2.50
426 Black	0.047	16%	0.40%	0.40%	0.00%	0.18	0.03	0.001	0.001	0.000		
Varnish	2.800	26%				17.47	3.19					
Heidelberg 2-color												
877 Silver	0.049	10%				0.12	0.02				0.02	0.02
Heidelberg 1-color												
K1242 Black	0.072	5%				0.09	0.02				0.02	0.02
New Heidelberg 5-color												
295 Blue	0.207	21%	0.40%	0.40%	0.002%	1.04	0.19	0.004	0.004	0.000	1.00	2.50
426 Black	0.047	16%	0.40%	0.40%	0.00%	0.18	0.03	0.001	0.001	0.000		
Varnish	2.800	26%				17.47	3.19					
Sub-total of New Heidelberg 5-color:						18.69	3.41	0.004	0.004	0.000	1.00	2.50
Sub-total of Existing Presses						19.63	3.58	0.008	0.005	0.000	1.04	2.55
Total Unrestricted Potential Emissions						38.32	6.99	0.025	0.019	0.000	2.04	5.05

METHODOLOGY

printing defined in rule 16, not surface coating art. 6 or coating line art. 1

VOC emission rate (lbs/day) = Maximum Usage (lbs/hr) * Weight % VOC * 24 hrs/day

VOC emission rate (tons/yr) = Maximum Usage (lbs/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs

HAPS emission rate (tons/yr) = Maximum Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAPS emission rate (tons/yr) for the Heidelberg 5-color are assumed to be the insignificant threshold.

HAPS emission rate (tons/yr) for the Heidelberg 2-color are assumed to be the emission rate of VOCs.

HAPS emission rate (tons/yr) for the Heidelberg 1-color are assumed to be the emission rate of VOCs.

HAPS emission rate (tons/yr) for the Heidelberg GTO are assumed to be the emission rate of the Heidelberg 1-color.

**Appendix A: Emission Calculations
Summary**

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendallville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Uncontrolled Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single HAP (Toluene)
Lines S-1, S-2, and S-3	-	-	-	-	-	3,030	-	1,997	1,277
Line S-4	-	-	-	-	-	1,119	-	851	511
Can Washer	-	-	-	-	-	52.42	-	13.10	13.10
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.13	0.0002
Offset Lithographic Presses	-	-	-	-	-	3.60	-	2.57	1.06
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	1.78	0.07
Total	0.13	0.52	0.52	0.04	6.78	4,209.67	5.70	2,865.67	1,802.03

Limited Potential to Emit (tons/year)									
Process	PM	PM₁₀	PM_{2.5}	SO₂	NOx	VOC	CO	TOTAL HAPs	Worst Single
Lines S-1, S-2, and S-3	-	-	-	-	-	240.00	-	99.86	63.83
Line S-4	-	-	-	-	-		-	42.55	25.55
Can Washer	-	-	-	-	-		-	0.66	0.66
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.78	0.37	5.70	0.13	0.00
Offset Lithographic Presses	-	-	-	-	-	3.60	-	2.57	1.06
Degreaser	-	-	-	-	-	0.49	-	-	-
Inkjet Printer G-1	-	-	-	-	-	3.42	-	1.78	0.07
Total	0.13	0.52	0.52	0.04	6.78	247.88	5.70	147.53	91.18

**Appendix A: Emission Calculations
42292 Minor Source Modification**

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Uncontrolled Potential to Emit of New Units (tons/year)									
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Combined HAPs	Single HAP (Nickel)
Inkjet Printer G-1	-	-	-	-	-	3.42	-	1.78	1.71
Total (tons/year):	0.00	0.00	0.00	0.00	0.00	3.42	0.00	1.78	1.71

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

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Material	Density (Lb/Gal)	Weight % Organics	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Unrestricted Potential VOC pounds per hour	Unrestricted Potential VOC pounds per day	Unrestricted Potential VOC tons per year
Lines S-1, S-2, and S-3									
Lacquer Paint	8.2	71.00%	21.85%	118.000	1.000	5.82	687.00	16487.90	3009.04
Solvent	6.8	100.00%	0.00%	0.70800	1.000	6.80	4.81	115.55	21.09
Line S-4									
Lacquer Paint	9.0	58.47%	27.62%	48.00000	1.000	5.28	253.43	6082.38	1110.03
Solvent	6.8	100.00%	0.00%	0.30900	1.000	6.80	2.10	50.43	9.20

The lines have 100% transfer efficiency. These lines are not sources of PM/PM10/PM2.5.

Unrestricted Potential Emission Add worst case coating to all solvents	947.34	22736.26	4149.37
VOC emissions are controlled by a thermal oxidizer with a 95% control efficiency:	47.37	1136.81	207.47

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)

Unrestricted Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Unrestricted Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Unrestricted 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

Appendix A: Emission Calculations
HAP Emission Calculations from the Coating Lines

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % DEHP	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	DEHP Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total Unit Emissions (ton/yr)	Controlled Unit Emissions (ton/yr)
Lines S-1, S-2, and S-3															
Lacquer Paint	8.2	118.00	1.000	15.00%	30.00%	1.00%	0.00%	1.00%	635.71	1271.43	42.38	0.00	42.38	1991.90	99.60
Solvent	6.8	0.71	1.000	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	5.27	0.00	0.00	0.00	5.27	0.26
Line S-4															
Lacquer Paint	9.0	48.00	1.000	10.80%	26.80%	2.10%	5.00%	0.00%	205.03	508.79	39.87	94.92	0.00	848.61	42.43
Solvent	6.8	0.31	1.000	0.00%	25.03%	0.00%	0.00%	0.00%	0.00	2.30	0.00	0.00	0.00	2.30	0.12
Total Unrestricted Potential Emissions									840.75	1,787.79	82.25	94.92	42.38	2,848.09	
HAP emissions are controlled by a thermal oxidizer with a 95% control efficiency:									42.04	89.39	4.11	4.75	2.12		142.40

METHODOLOGY:

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Thermal Oxidizer and oven**

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendallville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
15.8	1020	135.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.13	0.52	0.52	0.04	6.78	0.37	5.70

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas re

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-00

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

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

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichloro- benzene	Formaldehyde	Hexane	Toluene	
Potential Emission in tons/yr	1.425E-04	8.142E-05	5.089E-03	1.221E-01	2.307E-04	1.277E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Potential Emission in tons/yr	3.392E-05	7.463E-05	9.499E-05	2.578E-05	1.425E-04	3.718E-04
	Total HAPs					0.13
	Worst HAP					0.12

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, C

**Appendix A: Emissions Calculations
Can Washer**

**Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa**

Material	Density (Lb/Gal)	Weight % Organics	Gal of Mat. (gal/hr)	VOC content (lbs/gal)	Unrestricted Potential			326 IAC 8-1-6 minor limit	
					VOC (lb/hr)	VOC (lb/day)	VOC (tons/year)	VOC (tons/year)	VOC (lb/hr)
Can Washer Solvent	6.8	100%	1.76	6.80	11.97	287.23	52.42	24.90	5.68
Unrestricted Potential Emissions							52.42		
Controlled VOC emissions:							2.62		

A control efficiency of 52% would comply with the minor BACT limit.

VOC and HAP emissions are controlled by a thermal oxidizer with a Federally enforceable 95% control efficiency HAP limit:

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Toluene	Toluene Emissions (ton/yr)
Can Washer Solvent	6.8	1.76	25%	13.10

**Unrestricted Potential Emissions 13.10
PTE after NESHAP limit: 0.66**

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Unrestricted Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Unrestricted Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Unrestricted 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)

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and HAP Emission Calculations from the Offset Presses**

**Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa**

Material	Maximum Usage (lbs/hour)	Weight % VOC	Weight % Manganese Compounds	Weight % Cobalt Compounds	Weight % Naphthalene	VOC Emissions (lbs/day)	VOC Emissions (tons/yr)	Manganese Compounds Emissions (ton/yr)	Cobalt Compounds Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Highest Single HAP Emissions (ton/yr)	Total All HAPs Emissions (ton/yr)
Heidelberg 4-color												
432 Gray	0.143	21%	0.56%	0.12%	0.00%	0.73	0.13	0.004	0.001	0.000	0.004	0.005
Heidelberg 5-color												
295 Blue	0.207	21%	0.40%	0.40%	0.002%	1.04	0.19	0.004	0.004	0.000	1.00	2.50
426 Black	0.047	16%	0.40%	0.40%	0.00%	0.18	0.03	0.001	0.001	0.000		
Varnish	2.800	26%				17.47	3.19					
Heidelberg 2-color												
877 Silver	0.049	10%				0.12	0.02				0.02	0.02
Heidelberg 1-color												
K1242 Black	0.072	5%				0.09	0.02				0.02	0.02
Heidelberg GTO												
Ink						0.09	0.02				0.02	0.02

Total Unrestricted Potential Emissions 19.72 3.60 0.01 0.01 0.00 1.06 2.57

METHODOLOGY

printing defined in rule 16, not surface coating art. 6 or coating line art. 1

VOC emission rate (lbs/day) = Maximum Usage (lbs/hr) * Weight % VOC * 24 hrs/day
 VOC emission rate (tons/yr) = Maximum Usage (lbs/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs
 HAPS emission rate (tons/yr) = Maximum Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 HAPS emission rate (tons/yr) for the Heidelberg 5-color are assumed to be the insignificant threshold.
 HAPS emission rate (tons/yr) for the Heidelberg 2-color are assumed to be the emission rate of VOCs.
 HAPS emission rate (tons/yr) for the Heidelberg 1-color are assumed to be the emission rate of VOCs.
 HAPS emission rate (tons/yr) for the Heidelberg GTO are assumed to be the emission rate of the Heidelberg 1-color.
 The GTO is smaller by physical and operational design than the Heidelberg GTO.

Appendix A: Emission Calculations
VOC and HAP Emission Calculations from the Offset Presses

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Throughput				
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)	Throughput (ft ² /hr)
Production Mode	1.9	96.0	1138.3	902

Ink VOCs							
Ink Name Press Id	Density (lbs/gal)	Maximum Coverage Thickness (in)	Emission Factor (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	VOC PTE (tons/year)
G-1	8.68	0.002	75.2	10%	80%	1138.3	3.4

Total VOC Emissions = 3.4 tons/year

Ink HAPs							
Ink Name Press Id	Density (lbs/gal)	Maximum Coverage Thickness (in)	Emission Factor (lbs/MMin ²)	Weight % HAPs	Flash Off %	Throughput (MMin ² /year)	HAPs PTE (tons/year)
1516 Yellow or 2892 Yellow	8.68	0.002	75.2	5.00%	80%	1138.3	1.7 (Nickel)
2895 Black or 2795 Black	8.68	0.002	75.2	0.20%	80%	1138.3	0.1 (Toluene)
Total HAP Emissions =							1.8 tons/year

METHODOLOGY

Throughput (MMin² per year) = Maximum line speed feet/minute * 12 inches/foot * Maximum print width inches * 60 minutes/hour * 8760 hours/year

Emission Factor (lb/Mmin²) = Density (lb/gal) * Maximum Coverage Thickness (in) * 1 gal/231 in³ * 1,000,000 in² / 1 Mmin²

VOC Emissions (Tons/Year) = Emission Factor (lbs/MMin²) * Weight % Volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash Off % * Throughput (MMin²/year) * 1 ton/2000 lbs

NOTE: Heat set offset printing has an assumed flash off of 80%. Non-Heatset types of offset Lithographic Printers have a flash off of 5%.

(Source -EPA Guidance, "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (9/06))

Appendix A: Emissions Calculations
VOC/HAP Emissions

Company Name: Colwell, Inc.
Address City IN Zip: 2605 Marion Dr, Kendalville, IN 46755
Title V Permit No: 113-42316-00019
Reviewer: Wilfredo de la Rosa

Maintenance Cold cleaner Potential to Emit

$$\begin{aligned}\text{VOC/HAP Emissions/year} &= \text{Density} \times \text{Weight \% Volatile} \times \text{usage/year} \\ &= 6.7 \text{ lb/gal} \times 100\% \times 145 \text{ gallons/yr} \\ &= 971.5 \text{ lbs/yr} \\ &= \mathbf{0.49 \text{ tons VOC}}\end{aligned}$$

Specific daily usage information was not included in the application. Therefore, for purposes of determining applicability the worst case assumption is that 15 lb/day or greater can be emitted from this insignificant activity.

**Indiana Department of Environmental Management
Office of Air Quality**

**TSD Appendix B
Best Available Control Technology (BACT) Analysis
for a Part 70 Significant Source Modification
and Significant Permit Modification**

Source Background and Description
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Source Name:	Colwell, Inc.
Source Location:	2605 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752 (Commercial Printing, Lithographic) 2796 (Platemaking and Related Services)
Operation Permit No.:	T 113-39362-00019
Operation Permit Issuance Date:	May 1, 2018
Significant Source Modification No.:	113-42975-00019
Significant Permit Modification No.:	113-43021-00019
Permit Reviewer:	Wilfredo de la Rosa

Proposed Project

On June 17, 2020, the Office of Air Quality (OAQ) received an application from Colwell, Incorporated, located at 2605 Marion Drive, Kendallville, Indiana 46755, to construct two (2) new deposit presses, remove the roll coating line S-4, remove the Heidelberg GTO press and add the existing Heidelberg 5-color press in the permit. The proposed project will consist of the following emission units:

- (1) Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, controlled by a regenerative thermal oxidizer, identified as RTO-1, and exhausting to stack/vent ID #RTO-1.
- (2) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.

Requirement for Best Available Control Technology (BACT)

The uncontrolled emissions of each new deposit press are 384.10 tons per year VOCs. The new 5-color press is not associated with this evaluation as its PTE before controls is less than 25 tons per year VOC. One (1) existing enclosed industrial solvent cleaning operation identified as Can Washer, constructed in 1996 and currently exhausted through the existing RTO-1 has uncontrolled emissions of 52.42 tons per year VOCs.

See Appendix A – Emissions Calculations – of this TSD for detailed Potential to Emit (PTE) calculations.

This modification is subject to the requirements of 326 IAC 8-1-6 for the two (2) new deposit presses and the one (1) existing Can Washer since they each exceed 25 tons per year of uncontrolled VOC emissions and the source has requested no limitation of VOC emissions before controls for these emission units.

326 IAC 8-1-6 requires a best available control technology (BACT) review to be performed on the proposed modification for the following emission units:

- (1) Two (2) deposit presses, identified as Line 4(DP-1) and Line 5(DP-2), approved in 2020 for construction, each with a maximum throughput of 4,522 square feet of blank sheet per hour, controlled by a regenerative thermal oxidizer, identified as RTO-1, and exhausting to stack/vent ID #RTO-1.
- (2) One (1) enclosed industrial solvent cleaning operation, identified as Can Washer, constructed in 1996. VOC emission are controlled by the RTO-1, with emissions exhausted at Stack/Vent ID #RTO-1.

Summary of the Best Available Control Technology (BACT) Process

BACT is an emissions limitation based on the maximum degree of pollution reduction of emissions, which is achievable on a case-by-case basis. BACT analysis takes into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, work practices, and operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute significantly to air pollution, thereby protecting public health and the environment.

These BACT determinations are based on the following information:

- (a) The BACT analysis information submitted by Colwell, Inc. on August 9, 2020,
- (b) The EPA RACT/BACT/LAER (RBLCL) clearing house; and
- (c) State air quality permits

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by regulation or permit, or controls achieved in practice. The highest level of control is then evaluated for technical feasibility.

The five (5) basic steps of a top-down BACT analysis used by the Office of Air Quality (OAQ) to make BACT determinations are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies, and controls applied to similar source categories.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering, and source-specific factors related to safe and successful use of the controls. Innovative control means a control that has not been demonstrated in a commercial application on similar units. Innovative controls are normally given a waiver from the BACT requirements due to the uncertainty of actual control efficiency. A control technology is considered available when there are sufficient data indicating that the technology results in a reduction in emissions of regulated pollutants.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. The ranked alternatives are reviewed in terms of environmental, energy, and economic impacts specific to the proposed modification. If the analysis determines that the evaluated alternative is not appropriate as BACT due to any of the impacts, then the next most effective is evaluated. This process is repeated until a control alternative is chosen as BACT. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step entails an evaluation of energy, environmental, and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts.

For the technologies determined to be feasible, there may be several different limits that have been set as BACT for the same control technology. The permitting agency has to choose the most stringent limit as BACT unless the applicant demonstrates in a convincing manner why that limit is not feasible. BACT must, at a minimum, be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

Step 5: Select BACT

The Office of Air Quality (OAQ) makes final BACT determinations by following the five steps

VOC BACT for the Deposit Press: 4(DP-1) and 5(DP-2)

STEP 1– IDENTIFICATION OF VOC CONTROL TECHNOLOGIES

The following control technologies were identified and evaluated to control VOC emissions from the deposit presses and associated solvent usage.

- (a) Inherently lower polluting processes or practices
Reduction in VOC emissions can occur by changes in processes and the materials being used so that VOCs are reduced through the use of a less volatile solvent or replaced with waterborne material.
- (b) Good Work Practices
Implementation of good work practices to minimize VOC emissions during cleaning activities from solvent transport, storage and usage.
- (c) Add-on Control Options
 - (1) Thermal Oxidation
 - (2) Catalytic Oxidation
 - (3) Carbon Adsorption
 - (4) Absorption
 - (5) Biofiltration

STEP 2 – ELIMINATE TECHNICALLY INFEASIBLE CONTROL OPTIONS

- (a) Inherently lower polluting processes or practices
Based on the information reviewed for this BACT determination, the facility is unable to use acetone or similar exempt solvents as reducers or thinners and low VOC materials in the two (2) new deposit presses, as materials are applied as supplied. Review of available SDS data confirms the facility uses materials with an as applied VOC content as much as 6.05 lbs/ gallon.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of inherently lower polluting processes or practices is not a technically feasible option for the deposit presses at this source. No further evaluation of this control technology will be conducted.

- (b) Good Work Practices
Based on the information reviewed for this BACT determination, the use of good work practices is a technically feasible option for the two (2) new deposit presses. Colwell has identified the following control measures that may be employed to control VOC emissions from solvent storage and usage associated with the deposit presses:

- (1) Transport VOC containing materials in closed containers;
- (2) Store inks, solvents and other VOC containing materials in sealed containers;
- (3) Use plunger cans, squeeze bottle or similar apparatus to apply VOC containing solvents to clean-up rags;
- (4) Store used rags from any manual cleaning operations that use VOC containing materials in spring-loaded closed containers.
- (5) Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance or clean-up.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of good work practices is a technically feasible option for the deposit presses at this source.

- (c) Add-on Control Options
The test for technical feasibility of any control option is whether it is both available and applicable to reducing VOC emissions from the proposed deposit presses.

- (1) Thermal Oxidation
Thermal Oxidizers (Regenerative or Recuperative (RTO)) are add-on control devices to control VOC emissions by simple reaction of the harmful air pollutants with oxygen and heat to form combustion products carbon dioxide and water. RTO uses a direct contact heat exchanger. These direct contact heat exchangers consist of a bed of porous ceramic packing or other structured, high heat capacity media. The source has indicated that the proposed units contain an existing regenerative thermal oxidizer.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of thermal oxidation (RTO) is a technically feasible option for the deposit presses at this source.

- (2) Catalytic Oxidation
A Catalytic Incinerator is an add-on control device to control VOC emissions by using a bed of catalyst that facilitates the oxidation of combustible gases. The catalyst increases the reaction rate and allows the conversion of VOC at lower temperature than a thermal incinerator.

Catalytic Incineration is not technically feasible to control the VOC emissions from the deposit presses because the source continually changes its coating formulations with each new formulation, likely having catalyst fouling characteristics, causing the destruction efficiency to degrade over time.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of catalytic oxidation is not a technically feasible option for the deposit presses at this source.

(3) Carbon Adsorption

Carbon Adsorbers are add-on control devices to control VOC emissions by adsorption. Carbon adsorption uses vessels filled with granular activated carbon (GAC) to adsorb VOC onto its surface. With continuous operations, at least two vessels are required. When the first unit's GAC is saturated with pollutants, emissions must be directed to the second unit while the first unit is regenerated or restored back to capacity. Regeneration is done with steam and/or heat. Pollutants are not destroyed in the carbon adsorption process, instead, they are transferred to another phase. Carbon adsorption is most effective for low exhaust flow rate VOC with intermediate molecular weights (45 to 130). In practice, smaller molecular weight compounds do not adsorb to the carbon well and larger compounds are not typically removed during regeneration.

Carbon Adsorbers are not technically feasible to control the VOC emissions from the new deposit presses because of the flammability of the VOC, difficulty of the recovery of the pollutants and the variability in the characteristics of the compounds used.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorber is not a technically feasible option for the deposit presses at this source.

(4) Absorption

Absorption controls VOC emissions by dissolving one or more soluble components of a gas mixture in a liquid in a wet scrubber, packed tower or bubble tower.

The use of absorption technology is not technically feasible for the new deposit presses since scrubbers exhibit inadequate liquid flow and plug nozzles, beds or mist eliminators. Scrubbers also have velocity constraints that play a key role with performance that the maximum removal efficiency may only reach 90 %.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of absorption is not a technically feasible option for the deposit presses at this source.

(5) Biofiltration

Biofiltration is a land intensive setup in which contaminated air is fed under an active bed of soil or other substrate containing living organisms, including bacteria and fungi. As the air rises through the soil, the microorganisms consume and convert the organic materials in the air stream to carbon dioxide and water. Biofiltration is not technically feasible for the source which operates 8 hours per day, 5 days per week only. The microorganisms, which convert VOCs to CO₂ and water require consistent exposure to VOCs to remain alive. The limited time would prevent the growth of the microorganisms making biofiltration infeasible.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of biofiltration is not a technically feasible option for the deposit presses at this source.

STEP 3 – RANK THE REMAINING CONTROL TECHNOLOGIES BY CONTROL EFFECTIVENESS

Based on the above evaluation, the remaining technically feasible control technologies for controlling VOC emissions from the deposit presses are ranked below by control efficiency:

Rank 1: Thermal Oxidation –98% overall control efficiency reduction of VOC.

Rank 2: Good Work Practices

STEP 4 – EVALUATE THE MOST EFFECTIVE CONTROLS AND DOCUMENT RESULTS

The EPA RACT/BACT/LAER Clearinghouse (RBLC) is a database system that provides emission limit data for industrial processes throughout the United States. The search of this clearinghouse was limited to sources with SIC Codes of 2752 (Commercial Printing, Lithographic) and 2796 (Platemaking and Related Services) for the last 10 years. The following table represents the BACT/LAER emission limitations established for printing presses.

Date	State	RBLC ID/IN Permit ID	Source	Affected Facility	BACT Determination
Proposed	IN	SSM 113-42975-00019	Colwell, Inc.	Deposit Press	(a) Regenerative Thermal oxidation, 98% destruction efficiency. (b) Good Work Practices
11/13/2013	IN	IN-0193/FESOP SPR 177-33499-00063	Color-Box LLC - Richmond Division	Printing Press	(a) Thermal oxidation, 98% destruction efficiency. (b) VOC content of fountain solution shall be no greater than 3% VOC as applied. (c) VOC composite vapor pressure from all cleaning materials shall be less than 10 mmhg at 20°C.
06/12/2015	IN	IN-0211/SPR001-35576-00039	EP Graphics	Printing Press	(a) Thermal oxidation, 98% destruction efficiency. (b) VOC content of fountain solution shall be no greater than 15% VOC as applied. (c) Blanket and roller washes shall have a vapor pressure no greater than 10 mmhg at 20°C or VOC limited to 70% or 7.0 lb/gal as applied.
01/03/2011	IN	IN-0130/F113 - 29548 -00021	Courier Kendallville	Printing Press	(a) Thermal oxidation, 98% destruction efficiency. (b) VOC content of fountain solution shall be no greater than 3% VOC as applied. (c) Blanket and roller washes shall have a vapor pressure no greater than 10 mm hg at 20°C or VOC limited to 70% or

					5.6 lb/gal as applied.
03/31/2018	IN	IN-0277/SSM 107-39261- 00052	LSC Communications	Printing Press	(a) Thermal oxidation, 98% destruction efficiency. (b) VOC content of fountain solution shall be no greater than 3% VOC as applied. (c) Blanket and roller washes shall have a vapor pressure no greater than 10 mm hg at 20°C or VOC limited to 70% or 2.5 lb/gal as applied.
11/26/2014	IN	IN-0207Part 70 SSM085- 34736-00009	R.R. Donnelley & Sons Company	Printing Press	(a) Thermal oxidizer, 98% destruction efficiency. (b) VOC content of fountain solution and wash: 3% VOC in fountain solution. (c) Blanket wash shall have a vapor pressure of 10 mmHg or 2.5 lb VOC/gal.
11/15/2018 Note: This is still a draft determination	LA	LA-0336*/PSD LA-819(M-1)	Graphic Packaging, LLC	Printing Press	(a) Use water-based electron beam (EB) or ultra-violet (UV) inks and coatings (b) VOC content of fountain solution shall be no greater than 5% VOC as applied

The source has proposed the existing Regenerative Thermal Oxidizer RTO-1 in conjunction with Good Work Practices, as the control system for the proposed deposit presses, Line 4(DP-1) and Line 5(DP-2). Since the source has proposed to accept the only technically feasible control technology with the highest VOC destruction efficiency as BACT, the economic, environmental, and energy impacts to the source have not been evaluated.

The deposit presses, Line 4(DP-1) and Line 5(DP-2) are special type of press with some properties of intaglio or etched/engraved design but would not qualify as lithographic printing. They do not use fountain solutions as pre-treatment and do not have an associated blanket and roller washes. The existing BACT determination VOC limits in the RBLC are specific to lithographic and flexographic printing presses.

STEP 5 – SELECT BACT

IDEM OAQ has determined that the best available control technology (BACT) to control VOC emissions from the proposed deposit presses, identified as Line 4(DP-1) and Line 5(DP-2) shall be as follows:

- (a) The exhaust of the new deposit presses shall be vented to the existing Regenerative Thermal Oxidizer, identified as RTO-1 with a minimum of 98% destruction efficiency for VOC.
- (b) Good work practices shall be performed, such as the following:
 - (1) Transport VOC containing materials in closed containers;
 - (2) Store inks, solvents and other VOC containing materials in sealed containers;
 - (3) Use plunger cans, squeeze bottle or similar apparatus to apply VOC containing solvents to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing materials in spring-loaded closed containers.
 - (5) Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance or clean-up.

VOC BACT for the Enclosed Can Washer

STEP 1– IDENTIFICATION OF VOC CONTROL TECHNOLOGIES

The following control technologies were identified and evaluated to control VOC emissions from the Can Washer and associated solvent usage.

- (a) Inherently lower polluting processes or practices
Reduction in VOC emissions can occur by changes in processes and the materials being used so that VOCs are reduced through the use of a less volatile solvent or replaced with waterborne material.
- (b) Good Work Practices
Implementation of good work practices to minimize VOC emissions during cleaning activities from solvent transport, storage and usage.
- (c) Add-on Control Options
 - (1) Thermal Oxidation
 - (2) Catalytic Oxidation
 - (3) Carbon Adsorption
 - (4) Absorption
 - (5) Biofiltration

STEP 2 – ELIMINATE TECHNICALLY INFEASIBLE CONTROL OPTIONS

- (a) Inherently lower polluting processes or practices
Based on the information reviewed for this BACT determination, the facility is unable to use acetone or similar exempt solvents as reducers or thinners and low VOC materials in the Can Washer, as materials are applied as supplied. Review of available SDS data confirms the facility uses materials with an as applied VOC content as much as 6.80 lbs/gallon.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of inherently lower polluting processes or practices is not a technically feasible option for the Can Washer at this source. No further evaluation of this control technology was conducted.

- (b) Good Work Practices
Based on the information reviewed for this BACT determination, the use of good work practices is a technically feasible option for the Can Washer. Colwell has identified the following control measures that may be employed to control VOC emissions from solvent storage and usage associated with the Can Washer:
 - (1) Transport VOC containing material in closed container.
 - (2) Store solvents and other VOC containing material in sealed containers;
 - (3) Use plunger cans, squeeze bottles or similar apparatus to apply VOC containing solvent to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing material in spring-loaded closed containers;
 - (5) Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - (6) Drain parts until dripping ceases before removal from a unit;
 - (7) Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 36 inches, whichever is less; and
 - (8) Operate the unit without heating the solvent above ambient room temperature.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of good work practices is a technically feasible option for the Can Washer at this source.

(c) Add-on Control Options

The test for technical feasibility of any control option is whether it is both available and applicable to reducing VOC emissions from the proposed deposit presses.

(1) Thermal Oxidation

Thermal Oxidizers (Regenerative or Recuperative (RTO)) are add-on control devices to control VOC emissions by simple reaction of the harmful air pollutants with oxygen and heat to form combustion products carbon dioxide and water. RTO uses a direct contact heat exchanger. These direct contact heat exchangers consist of a bed of porous ceramic packing or other structured, high heat capacity media. The source has indicated that the proposed unit contain an existing regenerative thermal oxidizer.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of thermal oxidation (RTO) is a technically feasible option for the Can Washer at this source.

(2) Catalytic Oxidation

A Catalytic Incinerator is an add-on control device to control VOC emissions by using a bed of catalyst that facilitates the oxidation of combustible gases. The catalyst increases the reaction rate and allows the conversion of VOC at lower temperature than a thermal incinerator.

Catalytic Incineration is not technically feasible to control the VOC emissions from the Can Washer because the source continually changes its coating formulations with each new formulation, likely having catalyst fouling characteristics, causing the destruction efficiently to degrade over time.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of catalytic oxidation is not a technically feasible option for the Can Washer at this source.

(3) Carbon Adsorption

Carbon Adsorbers are add-on control devices to control VOC emissions by adsorption. Carbon adsorption uses vessels filled with granular activated carbon (GAC) to adsorb VOC onto its surface. With continuous operations, at least two vessels are required. When the first units GAC is saturated with pollutants, emissions must be directed to the second unit while the first unit is regenerated or restored back to capacity. Regeneration is done with steam and/or heat. Pollutants are not destroyed in the carbon adsorption process, instead, they are transferred to another phase. Carbon adsorption is most effective for low exhaust flow rate VOC with intermediate molecular weights (45 to 130). In practice, smaller molecular weight compounds do not adsorb to the carbon well and larger compounds are not typically removed during regeneration.

Carbon Adsorbers are not technically feasible to control the VOC emissions from the Can Washer because of the flammability of the VOC, difficulty of the recovery of the pollutants and the variability in the characteristics of the compounds used.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorber is not a technically feasible option for the Can Washer at this source.

- (4) Absorption
 Absorption controls VOC emissions by dissolving one or more soluble components of a gas mixture in a liquid in a wet scrubber, packed tower or bubble tower.

The use of absorption technology is not technically feasible for the Can Washer since scrubbers exhibit inadequate liquid flow and plug nozzles, beds or mist eliminators. Scrubbers also have velocity constraints that play a key role with performance that the maximum removal efficiency may only reach 90 %.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of absorption is not a technically feasible option for the Can Washer at this source.

- (5) Biofiltration
 Biofiltration is a land intensive setup in which contaminated air is fed under an active bed of soil or other substrate containing living organisms, including bacteria and fungi. As the air rises through the soil, the microorganisms consume and convert the organic materials in the air stream to carbon dioxide and water. Biofiltration is not technically feasible for the source which operates 8 hours per day, 5 days per week only. The microorganisms, which convert VOCs to CO₂ and water require consistent exposure to VOCs to remain alive. The limited time would prevent the growth of the microorganisms making biofiltration infeasible.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of biofiltration is not a technically feasible option for the Can Washer at this source.

STEP 3 – RANK THE REMAINING CONTROL TECHNOLOGIES BY CONTROL EFFECTIVENESS

Based on the above evaluation, the remaining technically feasible control technologies for controlling VOC emissions from the Can Washer are ranked below by control efficiency:

Rank 1: Thermal Oxidation – 98% overall control efficiency reduction of VOC.

Rank 2: Good Work Practices

STEP 4 – EVALUATE THE MOST EFFECTIVE CONTROLS AND DOCUMENT RESULTS

The EPA RACT/BACT/LAER Clearinghouse (RBLC) is a database system that provides emission limit data for industrial processes throughout the United States. The search of this clearinghouse was limited to sources with SIC Codes of 2752 (Commercial Printing, Lithographic) and 2796 (Platemaking and Related Services) for the last 10 years. The following table represents the BACT/LAER emission limitations established for printing washer.

Date	State	RBLC ID/IN Permit ID	Source	Affected Facility	BACT Determination
Proposed	IN	Part 70 SSM 113-42975--00019	Colwell, Inc.	Enclosed Can Washer	(a) Thermal oxidation, 98% destruction efficiency. (b) Total Enclosure (c) Good Work Practices

10/05/2018	IL	IL-14040006	Win Pak Heat Seal	Washer	(a) Regenerative Thermal oxidation, 98% destruction efficiency. (b) Total Enclosure (c) Good Work Practices
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There is only one entry in the RBLC for printing washers. The source has proposed that the existing Regenerative Thermal Oxidizer RTO-1 in conjunction with Good Work Practices and Total Enclosure as the control system for the proposed Can Washer. Since the source has proposed to accept the only technically feasible control technology with the highest VOC destruction as BACT, the economic, environmental and energy impacts to the source have not been evaluated.

STEP 5 – SELECT BACT

IDEM OAQ has determined that the best available control technology (BACT) to control VOC emissions from the enclosed industrial solvent cleaning operation, identified as Can Washer shall be as follows:

- (a) The enclosure system shall be operated to meet the criteria for Total Closure, as per USEPA Method 204.
- (b) The captured emissions shall be ducted to the existing Regenerative Thermal Oxidizer, identified as RTO-1 that is operated to achieve a VOC destruction efficiency of at least 98 percent, on a rolling 3-hour average.
- (c) The Permittee shall implement the following work practices to reduce VOC emission from the Can Washer:
 - (1) Transport VOC containing material in closed container.
 - (2) Store solvents and other VOC containing material in sealed containers;
 - (3) Use plunger cans, squeeze bottles or similar apparatus to apply VOC containing solvent to clean-up rags;
 - (4) Store used rags from any manual cleaning operations that use VOC containing material in spring-loaded closed containers;
 - (5) Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - (6) Drain parts until dripping ceases before removal from a unit;
 - (7) Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 36 inches, whichever is less; and
 - (8) Operate the unit without heating the solvent above ambient room temperature.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 11, 2020

Nick Mathis
Colwell, Inc.
PO Box 308
Kendallville, IN 46755

Re: Public Notice
Colwell, Inc.
Permit Level: Title V Sig Source Mod Minor PSD
Title V Sig Permit Mod
Permit Number: 113-42975-00019
113-43021-00019

Dear Mr. Mathis:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 42975 and 43021.

and

IDEM's Virtual File Cabinet (VFC): <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Kendallville Public Library, 221 South Park Avenue in Kendallville, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Wilfredo de la Rosa, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8422 or dial (317) 232-8422.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 11, 2020

To: Kendallville Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Colwell, Inc.
Permit Number: 113-42975-00019 & 113-43021-00019

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 11, 2020

Colwell, Inc.

113-42975-00019; 113-43021-00019

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 11, 2020

A 30-day public comment period has been initiated for:

Permit Number: 113-42975-00019 & 113-43021-00019

Applicant Name: Colwell, Inc.

Location: Kendallville, Noble County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	TAWEAVER 9/11/2020 Colwell Inc 113-42975-00019 & 113-43021-00017 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Nick Mathis Colwell Inc PO Box 308 Kendallville IN 46755 (Source CAATS)										
2		Jim Skinner Vice President of Operations Colwell Inc PO Box 308 Kendallville IN 46755 (RO CAATS)										
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)										
4		Noble County Health Department 2090 N SR 9, Suite C Albion IN 46701-9566 (Health Department)										
5		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
6		Kendallville Public Library 221 S Park Avenue Kendallville IN 46755-1740 (Library)										
7		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
8		Ligonier City Council and Mayors Office 301 S. Cavin St. #2 Ligonier IN 46767 (Local Official)										
9		Kendallville City Council and Mayors Office 234 S. Main Street Kendallville IN 46755 (Local Official)										
10		Mary Parson SES Environmental 3807 Transportation Dr Fort Wayne IN 46818 (Consultant)										
11		Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)										
12		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)										
13												
14												
15												

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