NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Avery Dennison in Hancock County

Significant Source Modification No.: 059-43441-00018
Significant Permit Modification No.: 059-43443-00018

The Indiana Department of Environmental Management (IDEM) has received an application from Avery Dennison, located at 870 West Anderson Blvd., Greenfield, Indiana 46140, for a significant modification of its Part 70 Operating Permit issued on August 3, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Avery Dennison to make certain changes at its existing source. Avery Dennison has applied to construct a new pressure sensitive coating operation with associated natural gas-fired drying ovens, and water-based adhesive storage tanks.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Hancock Public Library
900 W. McKenzie Rd.
Greenfield, IN 46140

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 SSM059-43441-00018 and SPM059-43443-00018 in all correspondence.

Comments should be sent to:

Paul Jump
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Paul Jump or (317) 234-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Paul Jump
E-mail: pjump@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, 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 Paul Jump of my staff at the above address.

Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality
Tyler Nestleroad  
Avery Dennison  
870 West Anderson Blvd.  
Greenfield, IN 46140  

Re: 059-43443-00018  
Significant Permit Modification  

Dear Tyler Nestleroad:  

Avery Dennison was issued Part 70 Operating Permit Renewal No. T059-42230-00018 on August 3, 2020 for a stationary pressure sensitive paper coating and laminating operation located at 870 West Anderson Blvd., Greenfield, IN 46140. An application requesting changes to this permit was received on October 30, 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(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:  

Attachment A: 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations  
Attachment B: 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating  

Previously issued approvals for this source containing these attachments 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.  


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.  

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

If you have any questions regarding this matter, please contact Paul Jump, 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) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

Sincerely,

Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Hancock County
Hancock County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
**Part 70 Operating Permit (Renewal)**

**OFFICE OF AIR QUALITY**

Avery Dennison
870 West Anderson Blvd.
Greenfield, Indiana 46140

(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.

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<tr>
<td>Master Agency Interest ID.: 11475</td>
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<tr>
<td>Issued by: Original signed by:</td>
</tr>
<tr>
<td>Ghassan Shalabi, Section Chief</td>
</tr>
<tr>
<td>Permits Branch, Office of Air Quality</td>
</tr>
<tr>
<td>Issuance Date: August 3, 2020</td>
</tr>
<tr>
<td>Expiration Date: August 3, 2025</td>
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<tr>
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<td>Office of Air Quality</td>
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Attachment B: 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating
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 pressure sensitive paper coating and laminating operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>870 West Anderson Blvd., Greenfield, Indiana 46140</th>
</tr>
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<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>317/467/6960</td>
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<tr>
<td>SIC Code:</td>
<td>2672</td>
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<tr>
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<tr>
<td>Source Location Status:</td>
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<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
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<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
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<td></td>
<td>Major Source, Section 112 of the Clean Air Act</td>
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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) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

(1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;

(2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and

(3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1

(2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a
maximum capacity of 1500 billion square inches per year, exhausting to F-1;

(3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;

(4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and

(5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;

(2) One (1) roll coating operation, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;

(3) One (1) curtain coating operation; constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

(4) One (1) natural gas-fired Silicone Dryer, constructed in 2019, with a maximum heat input capacity of 3.65 MMBtu/hr;

(5) One (1) natural gas-fired Adhesive Dryer, constructed in 2019, with a maximum heat input capacity of 8.09 MMBtu/hr; and

(6) One (1) natural gas-fired Face Dryer, constructed in 2019, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]
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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Six (6) natural gas-fired unit heaters, constructed in 1994, with a maximum heat input capacity of 0.13 MMBtu/hr each.

(2) Twelve (12) natural gas-fired door heaters, constructed in 1994, with a maximum heat input capacity of 0.87 MMBtu/hr each.

(3) Seven (7) natural gas-fired rotation heating units, constructed in 1994, with a maximum heat input capacity of 0.40 MMBtu/hr each.

(4) Two (2) natural gas-fired roof top heating/cooling units, constructed in 2011, with a maximum heat input capacity of 0.40 MMBtu/hr each.

(5) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2012, with a maximum heat input capacity of 0.15 MMBtu/hr.

(6) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.35 MMBtu/hr.

(7) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.50 MMBtu/hr.

(8) One (1) natural gas-fired roof top heating/cooling unit, constructed in 2019, with a maximum heat input capacity of 0.4 MMBtu/hr.

(9) Six (6) natural gas-fired air makeup units, constructed in 2019, with a total heat input capacity of 2.65 MMBtu/hr.

(10) Three (3) natural gas-fired heaters, constructed in 2019, with a total heat input capacity of 0.16 MMBtu/hr.

(11) One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.25 MMBtu/hr.

(12) One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.10 MMBtu/hr.

(13) One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.30 MMBtu/hr.

(14) One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.03 MMBtu/hr.

(15) One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.175 MMBtu/hr.

(16) One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.225 MMBtu/hr.
(17) Two (2) natural gas-fired air rotation units, constructed in 2019, with a total heat input capacity of 3.125 MMBtu/hr.

(18) Two (2) natural gas-fired water heaters, identified as G3 Water Heater, constructed in 2019, with a heat input capacity of 0.8 MMBtu/hr, each

(19) One (1) natural gas-fired water heater, identified as G3 Water Heater, constructed in 2000, with a heat capacity of 0.5 MMBtu/hr.

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

(1) Vessels storing the following:

   (A) Hydraulic oils.
   (B) Lubricating oils.
   (C) Machining oils.
   (D) Machining fluids.

(2) Production related activities, including the following:

   (A) Application of the following as temporary protective coatings:

      (i) greases
      (ii) lubricants
      (iii) nonvolatile material
      (iv) oils

   (B) Machining where an aqueous cutting coolant continuously floods the machining interface.

   (C) Closed loop heating and cooling systems.

   (D) Infrared cure equipment.

(3) Water based activities, including the following:

   (A) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

      (i) Five (5) water-based emulsion adhesive storage tanks, each with a maximum capacity of 16,400 gallons.
      (ii) Nine (9) water-based emulsion adhesive storage tanks, each with a maximum capacity of 13,000 gallons.
      (iii) Twelve (12) water-based emulsion adhesive storage tanks, each with a maximum capacity of 13,500 gallons
      (iv) Two (2) emulsion wastewater storage tank, with a maximum capacity of 10,000 gallons.
      (v) One (1) wastewater storage tank, with a maximum capacity of 8,000 gallons.
      (vi) One (1) wastewater storage tank, with a maximum capacity of 10,000 gallons.

   (B) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
(C) Forced and induced draft cooling tower systems not regulated under a NESHAP.

(i) Four (4) cooling towers, each with a maximum recirculation rate of 1,800 gallons per minute.

(ii) Three (3) cooling towers, constructed in 2019 for construction, each with a maximum recirculation rate of 990 gallons per minute.

(4) Repair activities, including the following:

(A) Heat exchanger cleaning and repair.

(B) Process vessel degassing and cleaning to prepare for internal repairs.

(5) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following:

(A) Purging of gas lines.

(B) Purging of vessels.

(6) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:

(A) Catch tanks.

(B) Temporary liquid separators.

(C) Tanks.

(D) Fluid handling equipment.

(7) Blowdown for the following:

(A) Sight glass.

(B) Boiler.

(C) Cooling tower.

(D) Compressors.

(E) Pumps.

(8) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute as follows:

(A) Abrasive blasting.

(9) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

(A) For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.

(i) One (1) silicone mixing batch process.
A laboratory as defined in 326 IAC 2-7-1(21)(G).

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

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

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

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B GENERAL CONDITIONS

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T059-42230-00018, 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

   (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 5
   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 (PMP) 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;
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 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:

(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 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

(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 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).

(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 T059-42230-00018 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 combined permit, all previous registrations and permits are superseded by this combined new source review and 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)]

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 IGCN 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 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.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 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 5
  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 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:

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 317-233-8590 (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.
SECTION C  SOURCE OPERATION CONDITIONS

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

(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(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

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

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)]

(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.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 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.
A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;
(2) review of operation and maintenance procedures and records; and/or
(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 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).

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

C.15 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]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 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.16 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.17 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 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.18 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.
Section D.1   EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:</td>
</tr>
<tr>
<td>(1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;</td>
</tr>
<tr>
<td>(2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and</td>
</tr>
<tr>
<td>(3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.</td>
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<tr>
<td>[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]</td>
</tr>
<tr>
<td>[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]</td>
</tr>
<tr>
<td>(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:</td>
</tr>
<tr>
<td>(1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1</td>
</tr>
<tr>
<td>(2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;</td>
</tr>
<tr>
<td>(3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;</td>
</tr>
<tr>
<td>(4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and</td>
</tr>
<tr>
<td>(5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.</td>
</tr>
<tr>
<td>[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]</td>
</tr>
<tr>
<td>[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]</td>
</tr>
<tr>
<td>(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:</td>
</tr>
<tr>
<td>(1) Two (2) flow coating operations, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;</td>
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<td>6</td>
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</tbody>
</table>

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]
[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

1. One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two stacks, K-1 and L-1; and
2. One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line 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.)

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

**D.1.1 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:

(a) The use of VOC, including coatings, dilution solvents, and cleaning solvents from the three coating operations GF-1, GF-2, GF-3 and GF-4 shall be less than 243.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, 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 twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]**

Pursuant to 326 IAC 8-2-5, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, less water, from the coating lines, GF-1, GF-2, GF-3 and GF-4.
D.1.3 Preventive Maintenance Plan

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.

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) 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.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The total VOC usage for each month.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.1.1 shall be submitted 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).
### Emissions Unit Description:

#### Specifically Regulated Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

1. Six (6) natural gas-fired unit heaters, constructed in 1994, with a maximum heat input capacity of 0.13 MMBtu/hr each.
2. Twelve (12) natural gas-fired door heaters, constructed in 1994, with a maximum heat input capacity of 0.87 MMBtu/hr each.
3. Seven (7) natural gas-fired rotation heating units, constructed in 1994, with a maximum heat input capacity of 0.40 MMBtu/hr each.
4. Two (2) natural gas-fired roof top heating/cooling units, constructed in 2011, with a maximum heat input capacity of 0.40 MMBtu/hr each.
5. One (1) natural gas-fired roof top heating/cooling unit, constructed in 2012, with a maximum heat input capacity of 0.15 MMBtu/hr.
6. One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.35 MMBtu/hr.
7. One (1) natural gas-fired roof top heating/cooling unit, constructed in 2014, with a maximum heat input capacity of 0.50 MMBtu/hr.
8. One (1) natural gas-fired roof top heating/cooling unit, constructed in 2019, with a maximum heat input capacity of 0.4 MMBtu/hr.
9. Six (6) natural gas-fired air makeup units, constructed in 2019, with a total heat input capacity of 2.65 MMBtu/hr.
10. Three (3) natural gas-fired heaters, constructed in 2019, with a total heat input capacity of 0.16 MMBtu/hr.
11. One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.25 MMBtu/hr.
12. One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.10 MMBtu/hr.
13. One (1) natural gas-fired heater, constructed in 2019, with a heat input capacity of 0.30 MMBtu/hr.
14. One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.03 MMBtu/hr.
15. One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.175 MMBtu/hr.
(16) One (1) natural gas-fired propeller unit, constructed in 2019, with a heat input capacity of 0.225 MMBtu/hr.

(17) Two (2) natural gas-fired air rotation units, constructed in 2019, with a total heat input capacity of 3.125 MMBtu/hr.

(18) Two (2) natural gas-fired water heaters, identified as G3 Water Heater, constructed in 2019, with a heat input capacity of 0.8 MMBtu/hr, each.

(19) One (1) natural gas-fired water heater, identified as G4 Water Heater, constructed in 2000, with a heat capacity of 0.5 MMBtu/hr.

(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 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pound per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Six (6) Unit Heaters (1994)</td>
<td>0.434 (each)</td>
</tr>
<tr>
<td>Twelve (12) Door Heaters (1994)</td>
<td>0.434 (each)</td>
</tr>
<tr>
<td>Seven (7) Rotation Heating Units (1994)</td>
<td>0.434 (each)</td>
</tr>
<tr>
<td>Two (2) Roof Top Heating/Cooling Units (2011)</td>
<td>0.404 (each)</td>
</tr>
<tr>
<td>One (1) Roof Top Heating/Cooling Unit (2012)</td>
<td>0.404</td>
</tr>
<tr>
<td>Two (2) Roof Top Heating/Cooling Units (2014)</td>
<td>0.402 (each)</td>
</tr>
<tr>
<td>One (1) Roof Top Heating/Cooling Unit (2019)</td>
<td></td>
</tr>
<tr>
<td>Six (6) Air Makeup Units (2019)</td>
<td>0.432 (each)</td>
</tr>
<tr>
<td>Six (6) Heaters (2019)</td>
<td></td>
</tr>
<tr>
<td>Three (3) Propeller Units (2019)</td>
<td></td>
</tr>
<tr>
<td>Two (2) Rotation Heating Units (2019)</td>
<td></td>
</tr>
<tr>
<td>G3 Water Heater (Two water heaters) (2019)</td>
<td></td>
</tr>
<tr>
<td>G4 Water Heater (One water heater) (2020)</td>
<td>0.470</td>
</tr>
</tbody>
</table>

D.2.2 Preventive Maintenance Plan

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.
SECTION E.1 NSPS

Emissions Unit Description:

(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

(1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;

(2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and

(3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1

(2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;

(3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;

(4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and

(5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
(2) One (1) roll coating operation, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;

(3) One (1) curtain coating operation; constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

(4) One (1) natural gas-fired Silicone Dryer, constructed in 2019, with a maximum heat input capacity of 3.65 MMBtu/hr;

(5) One (1) natural gas-fired Adhesive Dryer, constructed in 2019, with a maximum heat input capacity of 8.09 MMBtu/hr; and

(6) One (1) natural gas-fired Face Dryer, constructed in 2019, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]
[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line 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.)

---

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart RR.

(b) Pursuant to 40 CFR 60.4, 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 Pressure Sensitive Tape and Label Surface Coating Operations NSPS [326 IAC 12][40 CFR Part 60, Subpart RR]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart RR (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.440 (a), (b), and (c)
(2) 40 CFR 60.441
(3) 40 CFR 60.442 (a)(1)
(4) 40 CFR 60.443 (a)
(5) 40 CFR 60.445 (a)
SECTION E.2  NESHAP

Emissions Unit Description:

(a) One (1) pressure sensitive paper coating operation, identified as GF-1, with a total maximum capacity of one thousand two hundred forty (1,261) billion square inches per year, consisting of the following equipment:

(1) One (1) flow coating operation, constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack C-1;

(2) One (1) roll coating operation constructed in 1994, modified in 2014, with a maximum capacity of 1,261 billion square inches per year, exhausting to stack D-1; and

(3) Two (2) natural gas-fired drying ovens, constructed in 1994, with a total maximum heat input capacity of 48.7 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(b) One (1) pressure sensitive paper coating operation, identified as GF-2, with a total maximum capacity of 1,500 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, each, exhausting to stack E-1

(2) One (1) roll coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to F-1;

(3) One (1) curtain coating operation, constructed in 2000, modified in 2004, with a maximum capacity of 1500 billion square inches per year, exhausting to stack G-1;

(4) Two (2) natural gas-fired drying ovens, constructed in 2000, with a total maximum heat input capacity of 67.86 MMBtu/hr; and

(5) One (1) natural gas-fired drying oven, constructed in 2000, with a maximum heat input capacity of 4.0 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

(c) One (1) pressure sensitive paper coating operation, identified as GF-3, with a total maximum capacity of 1,614 billion square inches per year, consisting of the following equipment:

(1) Two (2) flow coating operations, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, each, exhausting to stack H-1;
### (2) One (1) roll coating operation, constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack I-1;

### (3) One (1) curtain coating operation; constructed in 2019, with a maximum capacity of 1614 billion square inches per year, exhausting to stack J-1;

### (4) One (1) natural gas-fired Silicone Dryer, constructed in 2019, with a maximum heat input capacity of 3.65 MMBtu/hr;

### (5) One (1) natural gas-fired Adhesive Dryer, constructed in 2019, with a maximum heat input capacity of 8.09 MMBtu/hr; and

### (6) One (1) natural gas-fired Face Dryer, constructed in 2019, with a maximum heat input capacity of 1.53 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility.]

[Under 40 CFR 63, Subpart JJJJ, the coating line is a new facility.]

### (d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

1. One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

2. One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]

[Under 40 CFR 63, Subpart JJJJ, the coating line 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)]


(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.2.2  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 B to the operating permit), which are incorporated by reference as 326 IAC 20-65, for the emission unit(s) listed above:

1. 40 CFR 63.3280
2. 40 CFR 63.3290
3. 40 CFR 63.3300
4. 40 CFR 63.3310
5. 40 CFR 63.3320 (a), (b) (2), (3), and (c)
6. 40 CFR 63.3330 (a), and (b)
7. 40 CFR 63.3340
8. 40 CFR 63.3360 (c), and (d)
9. 40 CFR 63.3370(a)(1), (b), and (o)(4), (5), and (6)
10. 40 CFR 63.3400(a), (b), and (d)
11. 40 CFR 63.3410(a)(1)(iii), (iv), (vi), and (b)
12. 40 CFR 63.3420
13. 40 CFR 63, Subpart JJJJ, Table 2
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-42230-00018

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:
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-42230-00018

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • 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

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
</tbody>
</table>

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: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Part 70 Permit No.: T059-42230-00018  
Facility: GF-1, GF-2, GF-3, and GF-4  
Parameter: VOC Input including coatings, dilution solvents, and cleaning solvents  
Limit: Less than 243.1 tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER: ______________________</th>
<th>YEAR: ______________________</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month</td>
<td>Column 1</td>
</tr>
<tr>
<td></td>
<td>(VOC) (tons)</td>
</tr>
<tr>
<td>This Month</td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
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</tr>
</tbody>
</table>

☐ 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: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-42230-00018

Months: __________ to __________ Year: __________

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<tr>
<td>Date of Deviation:</td>
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<td>Duration of Deviation:</td>
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<td>Number of Deviations:</td>
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<td></td>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<td>Probable Cause of Deviation:</td>
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<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________

Title / Position: ___________________________________________________________

Date: ___________________________________________________________________

Phone: _________________________________________________________________
Source Name: Avery Dennison  
Source Location: 870 West Anderson Blvd., Greenfield, IN 46140  
County: Hancock  
SIC Code: 2672 (Coated and Laminated Paper, Not Elsewhere Classified)  
Operation Permit No.: T 059-42230-00018  
Operation Permit Issuance Date: August 3, 2020  
Significant Source Modification No.: 059-43441-00018  
Significant Permit Modification No.: 059-43443-00018  
Permit Reviewer: Paul Jump

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 059-42230-00018 on August 3, 2020. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Hancock County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Hancock County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants
Hancock 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

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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(^1)</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

\(^1\)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: Vinyl Acetate

*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 Renewal No. 059-42230-00018, issued on August 3, 2020. Road fugitive calculations were provided during renewal, but were not included in the permit. This was corrected during this SSM/SPM permitting action.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Avery Dennison on October 30, 2020, relating to the construction of a new pressure sensitive coating operation with associated natural gas-fired drying oven, and water-based adhesive storage tanks.

The following is a list of the new emission units:

(a) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]
(b) Water based activities, including the following:

1. Five (5) water-based emulsion adhesive storage tanks, identified as GF-4 Tank 1-5, approved in 2020 for construction, with a maximum capacity of 13,500 gallons, each.

2. One (1) emulsion wastewater storage tank, identified as Waste Water Tank 2, approved in 2020 for construction, with a maximum capacity of 10,000 gallons.

### 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.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating Operation GF-4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>138.27</td>
<td>-</td>
<td>42.82</td>
<td>62.24</td>
</tr>
<tr>
<td>Adhesive Oven Associated with GF-4</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.78</td>
<td>0.26</td>
<td>4.02</td>
<td>0.09</td>
<td>0.09</td>
</tr>
<tr>
<td>Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.03</td>
<td>-</td>
<td>1.26E-03</td>
<td>1.26E-03</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.78</td>
<td>138.56</td>
<td>4.01</td>
<td>64.33</td>
<td>42.83</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP: Vinyl Acetate

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/or 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.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$$^1$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating Operation GF-4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>138.27</td>
<td>-</td>
</tr>
<tr>
<td>Adhesive Oven Associated with GF-4</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.78</td>
<td>0.26</td>
<td>4.02</td>
</tr>
<tr>
<td>Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.03</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total for Modification</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

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 modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) for more information regarding the limit(s).

(a) 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/or 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.
### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1, 2&lt;/sup&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>13.0</td>
<td>17.16</td>
<td>17.16</td>
<td>0.44</td>
<td>73.12</td>
<td>249.96</td>
<td>61.42</td>
<td>442.7</td>
<td>467.2</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
<td>24.99</td>
<td>19.56</td>
<td>17.75</td>
<td>0.44</td>
<td>73.12</td>
<td>249.96</td>
<td>61.42</td>
<td>442.7</td>
<td>467.2</td>
</tr>
</tbody>
</table>

**Title V Major Source Thresholds**

|                      | NA  | 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<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."
2. PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
3. Single highest source-wide HAP: Vinyl Acetate  
*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 Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the one (1) adhesive oven, since the oven is not a steam generating unit.

(b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for five (5) water-based emulsion adhesive storage tanks, one (1) emulsion wastewater storage tank, because each tank has a maximum storage capacity that is less than the applicability requirements found under 40 CFR 60.110b (a) (19,813 gallons/75 cubic meters).

(c) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV and 326 IAC 12, are not included in the permit for...
the one pressure sensitive paper coating operations, identified as GF-4, because this rule applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. Pursuant to 40 CFR 60.741, polymeric coating of supporting substrates involves coating a supporting web other than paper, plastic film, metallic foil, or metal coil. The coatings at this source are applied to paper; therefore, the source does not perform polymeric coating of supporting substrates.

(d) The one (1) pressure sensitive paper coating operation, identified as GF-4, is subject to the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12, because the coating operation GF-4 will commence construction after the applicability date, December 30, 1980. The pressure sensitive paper coating operation subject to this rule includes the following:

One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

The pressure sensitive paper coating operations, identified as GF-4, is subject to the following portions of Subpart RR.

(1) 40 CFR 60.440 (a), (b), and (c)
(2) 40 CFR 60.441
(3) 40 CFR 60.442 (a)(1)
(4) 40 CFR 60.443 (a)
(5) 40 CFR 60.445 (a)

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the pressure sensitive paper coating operations, identified as GF-4, except as otherwise specified in 40 CFR 60, Subpart RR.

(e) 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 (NESHAPs) for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO and 326 IAC 20-77 are not included in the permit for the pressure sensitive paper coating operations, identified as GF-4, since the coating operation GF-4 is part of the affected source of 40 CFR 63, Subpart JJJJ and therefore not subject to the requirements of this rule.

(b) The one (1) pressure sensitive paper coating operation, identified as GF-4, is subject to the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ, which is incorporated by reference as 326 IAC 20-65, because the source owns and operate new or existing web coating lines that is a major source of HAP. The pressure sensitive paper coating line, identified as GF-4 is a new affected unit because it was constructed in 2020 after the applicability date of September 13, 2000. The compliance date for the emission
unit GF-4 is immediately upon start-up. The pressure sensitive paper coating operation subject to this rule includes the following:

One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]

The pressure sensitive paper coating operations, identified as GF-4 is subject to the following portions of Subpart JJJJ:

(1) 40 CFR 63.3280
(2) 40 CFR 63.3290
(3) 40 CFR 63.3300
(4) 40 CFR 63.3310
(5) 40 CFR 63.3320 (a), (b) (2), (3), and (c)
(6) 40 CFR 63.3330 (a), and (b)
(7) 40 CFR 63.3340
(8) 40 CFR 63.3360 (c), and (d)
(9) 40 CFR 63.3370(a)(1), (b), and (o)(4), (5), and (6)
(10) 40 CFR 63.3400(a), (b), and (d)
(11) 40 CFR 63.3410(a)(1)(iii), (iv), (vi), and (b)
(12) 40 CFR 63.3420
(13) 40 CFR 63, Subpart JJJJ, Table 2

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the pressure sensitive paper coating operations, identified as GF-4, except as otherwise specified in 40 CFR 63, Subpart JJJJ.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), are not included for the adhesive oven since it is not considered a boiler as defined by 40 CFR 63.11237.

(d) 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.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification.

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD section of this document.

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 use of VOC, including coatings, dilution solvents, and cleaning solvents from the three coating operations GF-1, GF-2, GF-3, and GF-4 shall be less than 243.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, 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 twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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).

(a) The paper coating operation GF-1 was constructed before the rule applicability date of July 27, 1997. The paper coating operation GF-1 was constructed in 1994. Therefore, the requirements of 326 IAC 2-4.1 do not apply to paper coating operation GF-1.

(b) The operation of the emission unit GF-2 and GF-4 will emit equal to or greater than ten (10) tons per year for a single HAP AND/OR 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 emission unit GF-2 and GF-4. However, pursuant to 326 IAC 2-4.1-1(b)(2), because the emission unit GF-2 and GF-4 are specifically regulated under NESHAP 40 CFR 63, Subpart JJJJ, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, the emission unit GF-2 and GF-4 are exempt from the requirements of 326 IAC 2-4.1.

(c) The operation of the emission unit GF-3, constructed in 2019, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to emission unit GF-3.
326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to
have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2),
the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar
year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall
contain, at a minimum, the information specified in 326 IAC 2-6-4.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive
particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Hancock County) is not subject to the
requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn,
Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Hancock County) is not subject to the
requirements of 326 IAC 6.8 because it is not located in Lake County.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to this modification, state rule applicability has been reviewed as follows:</td>
</tr>
</tbody>
</table>

Coating operation GF-4

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the paper coating operations GF-4, is exempt from this rule because the
emission unit utilizes roll coating and flow coating.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The coating operations GF-4, constructed after January 1, 1980, and with unlimited VOC potential
emissions greater than twenty-five (25) tons per year, are not subject to 326 IAC 8-1-6 since it is regulated
by other rules in 326 IAC 8.

326 IAC 8-2-5 (Paper Coating Operations)
The paper coating operations, GF-4, is subject to this rule because the coating line commenced
construction after January 1, 1980, has potential emissions of twenty-five (25) tons or greater per year of
VOC, and coats paper. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not
allow the discharge into the atmosphere VOC in excess of three and two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

326 IAC 8-5-5 (Graphic Arts Operations)
The source does not perform packaging flexographic printing or packaging rotogravure printing or publication rotogravure printing. Therefore, the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) does not apply to this source.

326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)
The source is not located in Lake or Porter County. Therefore, the requirements of 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing) does not apply to this source.

Natural Gas-Fired Adhesive Oven

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas fired oven is not subject to the requirements of 326 IAC 6-2, since the oven is a source of direct heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. Therefore, natural gas fired oven is exempt from the requirements of 326 IAC 6-3

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the oven combusting natural gas is not subject to the requirements of 326 IAC 7-1, since the oven has uncontrolled sulfur dioxide (SO2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the adhesive oven associated with coating operations GF-4 was constructed after January 1, 1980, they are 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, each.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 does not apply to the oven, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 does not apply to the oven, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Storage Tanks

326 IAC 8-6 (Organic Solvent Emission Limitations)
Pursuant to 326 IAC 8-6-1(2), the six (6) storage tanks are not subject to 326 IAC 8-6 because potential to emit of the source is less than 100 tons of VOCs per year and they are not located in Lake or Marion county. Therefore, 326 IAC 8-6 does not apply.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)
This rule applies to stationary vessels used to store volatile organic liquid that are located in Clark, Floyd, Lake or Porter County. This source is located in Hancock County and therefore, the provisions of 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels) do not apply to this source.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain
compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

Testing Requirements:

IDEM OAQ has determined that testing of any emission unit is not required at this time. IDEM has the authority to require testing at a later time if necessary, to demonstrate compliance with any applicable requirement.

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):

(1) IDEM OAQ has added one (1) pressure sensitive paper coating operation to Section A.2, D.1, E.1, and E.2. In addition IDEM OAQ updated the provisions in Section E.2 as requested by the source.

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:

***

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line is an existing affected source]
### Section D.1  EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(d)</td>
<td>One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:</td>
</tr>
<tr>
<td>(1)</td>
<td>One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and</td>
</tr>
<tr>
<td>(2)</td>
<td>One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.</td>
</tr>
</tbody>
</table>

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]  
[Under 40 CFR 63, Subpart JJJJ, the coating line 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.)

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

<table>
<thead>
<tr>
<th>D.1.1</th>
<th>PSD Minor Limit [326 IAC 2-2]</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</td>
<td></td>
</tr>
<tr>
<td>(a)</td>
<td>The use of VOC, including coatings, dilution solvents, and cleaning solvents from the three coating operations GF-1, GF-2, GF-3 and GF-4 shall be less than 243.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.</td>
</tr>
</tbody>
</table>

***

<table>
<thead>
<tr>
<th>D.1.2</th>
<th>Volatile Organic Compounds (VOC) [326 IAC 8-2-5]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pursuant to 326 IAC 8-2-5, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, less water, from the coating lines, GF-1, GF-2, GF-3 and GF-4.</td>
<td></td>
</tr>
</tbody>
</table>

***
Emissions Unit Description:

***

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line 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.)

Emissions Unit Description:

***

(d) One (1) pressure sensitive paper coating operation, identified as GF-4, with a maximum capacity of 1,076 billion square inches per year, consisting of the following equipment:

(1) One (1) adhesive coating operation, approved in 2020 for construction, with a maximum capacity of 1,076 billion square inches per year, exhausting to two (2) stacks, K-1 and L-1; and

(2) One (1) natural gas-fired Adhesive Oven, approved in 2020 for construction, with a maximum heat input capacity of 11.14 MMBtu/hr.

[Under 40 CFR 60, Subpart RR, the coating line is an affected facility]
[Under 40 CFR 63, Subpart JJJJ, the coating line 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.)
E.2.2  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 B to the operating permit), which are incorporated by reference as 326 IAC 20-65, for the emission unit(s) listed above:

1. 40 CFR 63.3280
2. 40 CFR 63.3290
3. 40 CFR 63.3300
4. 40 CFR 63.3310
5. 40 CFR 63.3320 (a), (b) (2), (3), and (c)
6. 40 CFR 63.3330 (a), and (b)
7. 40 CFR 63.3340
8. 40 CFR 63.3360 (c), and (d)
9. 40 CFR 63.3370(a)(1), (2), (3),(b), (c), (d), (4), and (no)(4), (5), and (6)
10. 40 CFR 63.3400(a), (b)(1), (2), (3), (c), and (gd)
11. 40 CFR 63.3410(a)(1)(iii), (iv), (vi), and (b)
12. 40 CFR 63.3420
13. 40 CFR 63, Subpart JJJJ, Table 2

(2) IDEM OAQ has added five (5) water-based emulsion adhesive storage tanks and one (1) emulsion wastewater tank to Section A.3.

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):

***

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

***

(3) Water based activities, including the following:

(A) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

***

(iii) Seven (7)Twelve (12) water-based emulsion adhesive storage tanks, each with a maximum capacity of 13,500 gallons

(iv) One (1)Two (2) emulsion wastewater storage tank, with a maximum capacity of 7,00010,000 gallons.

***

(3) IDEM OAQ has one (1) pressure sensitive paper coating operation, GF-4, to art 70 Quarterly Report for VOC input.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-42230-00018
Facility: GF-1, GF-2, GF-3 and GF-4
Parameter: VOC Input including coatings, dilution solvents, and cleaning solvents
Limit: Less than 243.1 tons per twelve (12) consecutive month period

***

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 the purposes of this review was received on October 30, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 059-43441-00018. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 059-43443-00018.

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

IDEM Contact

(a) If you have any questions regarding this permit, please contact Paul Jump, 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) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

(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

**PTE Summary**

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump

#### Uncontrolled Potential to Emit (tons/yr)

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<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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</thead>
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</tr>
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</table>

* PM2.5 listed is direct PM2.5

#### Limited Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
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<td>Drying Ovens Associated with GF-1</td>
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<td>1.59</td>
<td>0.13</td>
<td>20.91</td>
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<td>17.57</td>
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<tr>
<td>Drying Ovens Associated with GF-2</td>
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<td>2.35</td>
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<td>30.86</td>
<td>1.70</td>
<td>25.92</td>
</tr>
<tr>
<td>Drying Ovens Associated with GF-3</td>
<td>0.11</td>
<td>0.43</td>
<td>0.43</td>
<td>0.03</td>
<td>5.69</td>
<td>0.31</td>
<td>4.78</td>
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<tr>
<td>Drying Ovens Associated with GF-4</td>
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<td>0.36</td>
<td>0.03</td>
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<td>Insignificant NG</td>
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<tr>
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</table>

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.
### Uncontrolled Potential to Emit (tons/yr)

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<tr>
<th>Emission Unit</th>
<th>Vinyl Acetate</th>
<th>Formaldehyde</th>
<th>Methanol</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total HAPs</th>
<th>Worst Single HAPs</th>
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<td>21.41</td>
<td>467.2</td>
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Note: The shaded cells indicate where limits are included.

### Limited Potential to Emit (tons/yr)

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<th>Hexane</th>
<th>Toluene</th>
<th>Total HAPs</th>
<th>Worst Single HAPs</th>
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</thead>
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<td>Hexane</td>
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<td>1.3</td>
<td>21.41</td>
<td>467.2</td>
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Note: The shaded cells indicate where limits are included.
## Appendix A: Emission Calculations

### Modification Summary

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<th>Avery Dennison</th>
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</tr>
<tr>
<td>IN Zip:</td>
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<tr>
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<td>Significant Permit Mod. No:</td>
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<td>Paul Jump</td>
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<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating Operation GF-4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>138.27</td>
<td>-</td>
</tr>
<tr>
<td>Drying Ovens Associated with GF-4</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.78</td>
<td>0.26</td>
<td>4.02</td>
<td>0.09</td>
<td>0.09</td>
</tr>
<tr>
<td>Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.03</td>
<td>1.26E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.09</strong></td>
<td><strong>0.36</strong></td>
<td><strong>0.36</strong></td>
<td><strong>0.03</strong></td>
<td><strong>4.78</strong></td>
<td><strong>0.26</strong></td>
<td><strong>4.02</strong></td>
<td><strong>138.57</strong></td>
<td><strong>64.33</strong></td>
</tr>
</tbody>
</table>

Uncontrolled Potential to Emit (tons/yr)

- **Vinyl Acetate**
- **Hexane**
The Permittee uses different coating materials (only one material at a time) in the coating operation, GF-4. The worst-case material is identified in bold and taken for total.

**METHODOLOGY**

Potential to Emit (ton/yr) = Throughput (Mmin^2/yr) x maximum Coverage (lb/Mmin^2) x wt% VOC/HAP x 1 ton/2,000 lbs
Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Avery Dennison
Address City IN Zip: 870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No: 059-43441-00018
Significant Permit Mod. No: 059-43443-00018
Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

Potential Emission in tons/yr: 0.09

**see below

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 = 55, Low NOx Burners/Flue gas recirculation = 32

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, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>1.5E-02</td>
<td>1.8E-04</td>
<td>3.4E-03</td>
<td>1.8E-04</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.5E-04</td>
<td>5.7E-05</td>
<td>3.8E-03</td>
<td>0.09</td>
<td>1.8E-04</td>
<td>0.09</td>
</tr>
</tbody>
</table>

HAPs - Metals

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.6E-05</td>
<td>1.1E-05</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.4E-05</td>
<td>5.3E-05</td>
<td>6.7E-05</td>
<td>1.8E-05</td>
<td>1.0E-04</td>
<td>2.6E-04</td>
</tr>
</tbody>
</table>

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, Chapter 1.4.
### Appendix A: Emission Calculations
#### Storage Tanks

**Company Name:** Avery Dennison  
**Address City IN Zip:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump


<table>
<thead>
<tr>
<th>Storage Tank ID</th>
<th>Tank Type</th>
<th>Tank Color/ Shade</th>
<th>Tank Dimensions</th>
<th>Maximum Liquid Volume (gal)</th>
<th>Product Throughput (gal/yr)</th>
<th>VOC Working Losses (lbs/yr)</th>
<th>VOC Breathing Losses (lbs/yr)</th>
<th>Total VOC Losses (tons/yr)</th>
<th>VOC Working Losses (tons/yr)</th>
<th>VOC Breathing Losses (tons/yr)</th>
<th>Total VOC Losses (tons/yr)</th>
<th>HAP Working Losses (tons/yr)</th>
<th>HAP Breathing Losses (tons/yr)</th>
<th>Total HAP Losses (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GF-4 Tank 1</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>4.10E-03</td>
<td>2.17E-03</td>
<td>8.27E-03</td>
<td>1.65E-04</td>
<td>8.74E-05</td>
</tr>
<tr>
<td>GF-4 Tank 2</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>4.10E-03</td>
<td>2.17E-03</td>
<td>8.27E-03</td>
<td>1.65E-04</td>
<td>8.74E-05</td>
</tr>
<tr>
<td>GF-4 Tank 3</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>4.10E-03</td>
<td>2.17E-03</td>
<td>8.27E-03</td>
<td>1.65E-04</td>
<td>8.74E-05</td>
</tr>
<tr>
<td>GF-4 Tank 4</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>4.10E-03</td>
<td>2.17E-03</td>
<td>8.27E-03</td>
<td>1.65E-04</td>
<td>8.74E-05</td>
</tr>
<tr>
<td>GF-4 Tank 5</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>4.10E-03</td>
<td>2.17E-03</td>
<td>8.27E-03</td>
<td>1.65E-04</td>
<td>8.74E-05</td>
</tr>
<tr>
<td>Waste Water Tank 2</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>10,000</td>
<td>18.2</td>
<td>182000</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
</tr>
</tbody>
</table>

*Total: 62.73 * 0.03 * 1.26E-03 Vinyl Acetate*
### THROUGHPUT

<table>
<thead>
<tr>
<th>Press I.D.</th>
<th>Maximum Line Speed (Feet/Min)</th>
<th>Maximum Print Width (Inches)</th>
<th>Throughput (MMin²/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GF-1</td>
<td>2500</td>
<td>80</td>
<td>1,261,440</td>
</tr>
</tbody>
</table>

### POTENTIAL TO EMIT (TON/yr)

<table>
<thead>
<tr>
<th>Coating</th>
<th>Maximum Coverage (lb/MMin²)</th>
<th>Weight % Organics</th>
<th>Weight % Vinyl Acetate</th>
<th>Weight % Formaldehyde</th>
<th>Weight % Methanol</th>
<th>Flash Off %</th>
<th>VOC</th>
<th>Vinyl Acetate</th>
<th>Formaldehyde</th>
<th>Methanol</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating 1</td>
<td>71</td>
<td>0.50%</td>
<td>0.40%</td>
<td>-</td>
<td>-</td>
<td>100%</td>
<td>223.91</td>
<td>179.12</td>
<td>1.00</td>
<td>0.00</td>
<td>180.12</td>
</tr>
<tr>
<td>Coating 2</td>
<td>26.5</td>
<td>0.034%</td>
<td>-</td>
<td>0.0163%</td>
<td>0.014%</td>
<td>100%</td>
<td>5.47</td>
<td>0.00</td>
<td>2.62</td>
<td>2.25</td>
<td>4.87</td>
</tr>
<tr>
<td>Coating 3</td>
<td>2.84</td>
<td>1%</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>100%</td>
<td>17.91</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>223.91</td>
<td>179.12</td>
<td>2.62</td>
<td>2.25</td>
<td>180.12</td>
</tr>
</tbody>
</table>

The Permittee uses several different coating recipes. The above coatings represent worst-case VOC and HAP content.

**METHODOLOGY**

Throughput (MMin²/yr) = Maximum line speed (ft/min) x 12 in./ft x Maximum print width (in.) x 60 min/hr x 8760 hr/yr x (1 MMin² / 1,000,000 in²)

Potential to Emit (ton/yr) = Maximum Coverage (lb/MMin²) x Weight % x Flash Off % x Throughput (MMin²/yr) / 2000 lb/ton
### APPENDIX A: EMISSIONS CALCULATIONS

#### VOC AND HAPs FROM PRINTING PRESS OPERATIONS

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Press I.D.</th>
<th>MAXIMUM LINE SPEED (FEET/MIN)</th>
<th>MAXIMUM PRINT WIDTH (INCHES)</th>
<th>Throughput (MMin²/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GF-2</td>
<td>3000</td>
<td>79</td>
<td>1,494,806</td>
</tr>
</tbody>
</table>

#### Throughput

Throughput (MMin²/yr) = Maximum line speed (ft/min) x 12 in./ft x Maximum print width (in.) x 60 min/hr x 8760 hr/yr x (1 MMin² / 1,000,000 in²)

#### METHODOLOGY

Potential to Emit (ton/yr) = Maximum Coverage (lb/MMin²) x Weight % x Flash Off % x Throughput (MMin²/yr) / 2000 lb/ton

<table>
<thead>
<tr>
<th>Coating</th>
<th>Maximum Coverage (lb/MMin²)</th>
<th>Weight % Organics</th>
<th>Weight % Vinyl Acetate</th>
<th>Weight % Formaldehyde</th>
<th>Weight % Methanol</th>
<th>Flash Off %</th>
<th>VOC</th>
<th>Vinyl Acetate</th>
<th>Formaldehyde</th>
<th>Methanol</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating 1</td>
<td>71</td>
<td>0.50%</td>
<td>0.40%</td>
<td>-</td>
<td>-</td>
<td>100%</td>
<td>265.33</td>
<td>212.26</td>
<td>0.00</td>
<td>0.00</td>
<td>212.26</td>
</tr>
<tr>
<td>Coating 2</td>
<td>26.5</td>
<td>0.034%</td>
<td>-</td>
<td>0.0163%</td>
<td>0.014%</td>
<td>100%</td>
<td>6.48</td>
<td>0.00</td>
<td>3.11</td>
<td>2.67</td>
<td>5.77</td>
</tr>
<tr>
<td>Coating 3</td>
<td>2.84</td>
<td>1%</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>100%</td>
<td>21.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total 265.33  212.26  3.11  2.67  212.26

The Permittee uses several different coating recipes. The above coatings represent worst-case VOC and HAP content.
**AVERY DENNISON**

**Appendix A: Emissions Calculations**

**VOC and HAPs From Printing Press Operations**

Company Name: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, IN 46140  
Significant Source Mod. No: 059-43441-00018  
Significant Permit Mod. No: 059-43443-00018  
Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Press I.D.</th>
<th>Throughput (MMin²/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GF-3</td>
<td>1,614,044</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Coating</th>
<th>Maximum Coverage (lbs/MMin²)</th>
<th>wt% VOC</th>
<th>wt% Vinyl Acetate</th>
<th>wt% Toluene</th>
<th>Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>VOC</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Vinyl Acetate</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Toluene</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total HAPs</td>
</tr>
<tr>
<td><strong>GF-3</strong></td>
<td>25501</td>
<td>28.02</td>
<td>0.12%</td>
<td>0.00038</td>
<td>0.0028%</td>
<td>28.04</td>
</tr>
<tr>
<td></td>
<td>New Charity</td>
<td>22.76</td>
<td>0.33%</td>
<td>0.00003</td>
<td>0.0028%</td>
<td>60.06</td>
</tr>
<tr>
<td></td>
<td>S2550</td>
<td>32.71</td>
<td>0.00%</td>
<td>0.00003</td>
<td>0.0028%</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>S692</td>
<td>29.02</td>
<td>0.12%</td>
<td>0.00003</td>
<td>0.0028%</td>
<td>27.09</td>
</tr>
<tr>
<td></td>
<td>TruCut AT</td>
<td>28.02</td>
<td>0.47%</td>
<td>0.00003</td>
<td>0.0028%</td>
<td>106.28</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>106.28</td>
</tr>
</tbody>
</table>

The Permittee uses different coating materials (only one material at a time) in the coating operation, GF-3. The worst-case material is identified in bold and taken for total.

**METHODOLOGY**

Potential to Emit (ton/yr) = Throughput (Mmin²/yr) x maximum Coverage (lb/Mmin²) x wt% VOC/HAP x 1 ton/2,000 lbs
Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/hr <100
GF-1 Drying Ovens

Company Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No: 059-43441-00018
Significant Permit Mod. No: 059-43443-00018
Reviewer: Paul Jump

Heat Input Capacity

<table>
<thead>
<tr>
<th>HHV MMBtu/hr</th>
<th>Potential Throughput MMBtu/hr</th>
<th>Potential Throughput MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>48.7</td>
<td>418.2</td>
<td></td>
</tr>
</tbody>
</table>

Emission Factor in lb/MMCF

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

**See below

| Pollutant | 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 recirculation = 32

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, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

<table>
<thead>
<tr>
<th>HAPS - Organsics</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>4.4E-04</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>2.5E-04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>1.6E-02</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>3.8E-01</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>7.1E-04</td>
</tr>
<tr>
<td>Total - Organics</td>
<td></td>
<td>3.9E-01</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPS - Metals</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>1.0E-04</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>2.3E-04</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>2.9E-04</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>7.9E-05</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>4.4E-04</td>
</tr>
<tr>
<td>Total - Metals</td>
<td></td>
<td>1.1E-03</td>
</tr>
</tbody>
</table>

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, Chapter 1.4.
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**GF-2 Drying Ovens**

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu/MMCF</td>
<td>mmscf</td>
</tr>
<tr>
<td>71.86</td>
<td>617.2</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.59</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>2.35</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>2.35</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.19</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>30.86</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>1.70</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>25.92</td>
</tr>
</tbody>
</table>

**Emission Factors for NOx:**  
- Uncontrolled = 100  
- Low NOx Burner = 50  
- Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

**MMBtu = 1,000,000 Btu**  
**MMCF = 1,000,000 Cubic Feet of Gas**

**HAPS Calculations**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>5.8E-01</td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 6.5E-04 | 3.7E-04 | 2.3E-02 | 5.6E-01 | 1.0E-03 | 5.8E-01 |

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 1.5E-04 | 3.4E-04 | 4.3E-04 | 1.2E-04 | 6.5E-04 | 1.7E-03 |

**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, Chapter 1.4.**

<table>
<thead>
<tr>
<th>Total HAPs</th>
<th>5.8E-01</th>
</tr>
</thead>
<tbody>
<tr>
<td>Worst HAP</td>
<td>5.6E-01</td>
</tr>
</tbody>
</table>
Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No.: 059-43441-00018
Significant Permit Mod. No.: 059-43443-00018
Reviewer: Paul Jump

Heat Input Capacity | HHV | Potential Throughput | Emission Unit | Total Heat Input Capacity
--- | --- | --- | --- | ---
MMBtu/hr | MMBTU/MMCF | MMCF/yr | Heat Input Capacity | Capacity
13.3 | 1020 | 113.8 | GP-3 Silicone Dryer | 3.635
| | | | GP-3 Adhesive Dryer | 8.09
| | | | GP-3 Face Dryer | 1.53
| | | | Total | 13.255

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>109</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.11</td>
<td>0.43</td>
<td>0.43</td>
<td>0.03</td>
<td>5.69</td>
<td>0.31</td>
<td>4.78</td>
</tr>
</tbody>
</table>

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 recirculation = 32

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>3.4E-03</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.2E-04</td>
<td>6.5E-05</td>
<td>4.3E-03</td>
<td>0.10</td>
<td>1.9E-04</td>
<td>0.11</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>3.1E-03</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.8E-05</td>
<td>6.3E-05</td>
<td>8.0E-05</td>
<td>2.2E-05</td>
<td>1.2E-04</td>
<td>3.1E-04</td>
</tr>
</tbody>
</table>

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, Chapter 1.4.
# Appendix A: Emissions Calculations

## Natural Gas Combustion Only

### MM BTU/HR <100

### Natural Gas-Fired Units Classified as Insignificant Activities

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No.:** 059-43441-00018  
**Significant Permit Mod. No.:** 059-43443-00018  
**Reviewer:** Paul Jump

### Number of Units Unit Heat Input Capacity (MMBtu/hr) Heat Input Capacity (MMBtu/hr)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Number of Units</th>
<th>Unit Heat Input Capacity (MMBtu/hr)</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Make-Up Air Unit</td>
<td>6</td>
<td>0.44</td>
<td>2.65</td>
</tr>
<tr>
<td>Heater</td>
<td>3</td>
<td>0.05</td>
<td>0.16</td>
</tr>
<tr>
<td>Air Rotation Units</td>
<td>2</td>
<td>1.5625</td>
<td>3.125</td>
</tr>
<tr>
<td>G3 Hot Water</td>
<td>2</td>
<td>0.8</td>
<td>1.6</td>
</tr>
<tr>
<td>G2 Hot Water</td>
<td>1</td>
<td>0.5</td>
<td>0.5</td>
</tr>
</tbody>
</table>

Total 1 16.22 1020 217.58  
Total 2 9.115

### Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### 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, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

### HAPs Calculations

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>2.0E-01</td>
</tr>
</tbody>
</table>

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>6.0E-04</td>
</tr>
</tbody>
</table>

### Potential Emission in tons/yr

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.21</td>
<td>0.83</td>
<td>0.83</td>
<td>0.07</td>
<td>10.88</td>
<td>0.60</td>
<td>9.14</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM 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 recirculation = 32**

### Total HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0E-01</td>
<td>2.1E-01</td>
</tr>
</tbody>
</table>

### Worst HAP - Hexane

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, Chapter 1.4.
Appendix A: Emission Calculations
Cooling Towers
Particulate Matter

Company Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No: 059-43441-00018
Significant Permit Mod. No: 059-43443-00018
Reviewer: Paul Jump

Total liquid drift 0.02 % of recirculating flow
TDS content of recirculating water 1,800 ppm

<table>
<thead>
<tr>
<th>Unit</th>
<th>Total circulating flow rate (gal/min)</th>
<th>Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cooling Tower 1 (1994)</td>
<td>1,800</td>
<td>0.32</td>
<td>1.42</td>
</tr>
<tr>
<td>Cooling Tower 2 (1994)</td>
<td>1,800</td>
<td>0.32</td>
<td>1.42</td>
</tr>
<tr>
<td>Cooling Tower 3 (1994)</td>
<td>1,800</td>
<td>0.32</td>
<td>1.42</td>
</tr>
<tr>
<td>Cooling Tower 4 (1994)</td>
<td>1,800</td>
<td>0.32</td>
<td>1.42</td>
</tr>
<tr>
<td>Cooling Tower 5 (2018)</td>
<td>990</td>
<td>0.18</td>
<td>0.78</td>
</tr>
<tr>
<td>Cooling Tower 6 (2018)</td>
<td>990</td>
<td>0.18</td>
<td>0.78</td>
</tr>
<tr>
<td>Cooling Tower 7 (2018)</td>
<td>990</td>
<td>0.18</td>
<td>0.78</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>8.03</td>
</tr>
</tbody>
</table>

TDS = total dissolved solids
Assume TDS = PM = PM10 = PM2.5

Methodology
Total liquid drift (%) from AP-42, Table 13.4-1 (1/95)
 Potential to Emit (lb/hr) = Total circulating flow rate (gal/min) * 60 min/hr * 8.345 lb/gal * Total liquid drift (%) / 100 * TSD content of recirculating water (lb / 1,000,000 lb)
 Potential to Emit (ton/yr) = Potential to Emit (lb/hr) * 8760 hr/yr / 2000 lb/hr
| Storage Tank ID | Product Stored | Tank Type | Color/Shade | Tank Dimensions | Maximum Liquid Volume (gallons) | Turnovers per year | Product Throughput (gallons/yr) | VOC Working Losses (lbs/yr) | VOC Breathing Losses (lbs/yr) | Total VOC Losses (lbs/yr) | VOC Working Losses (tons/yr) | VOC Breathing Losses (tons/yr) | Total VOC Losses (tons/yr) | HAP Working Losses (tons/yr) | HAP Breathing Losses (tons/yr) | Total HAP Losses (tons/yr) |
|----------------|----------------|-----------|-------------|----------------|-------------------------------|------------------|-------------------------------|---------------------------|--------------------------|------------------------|-----------------------------|----------------------------|----------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| GF-1 Tank 1    | AT-20N         | Vertical Fixed Roof | Aluminum/Specular  | 16,400          | 16,400                        | 27               | 442,800                       | 5.82                      | 0.29                     | 6.11                   | 2.9E-03                     | 1.5E-04                    | 3.1E-03                   | 2.9E-03                     | 1.5E-04                     | 3.1E-03                     |
| GF-1 Tank 2    | AT-20          | Vertical Fixed Roof | Aluminum/Specular  | 16,400          | 16,400                        | 27               | 442,800                       | 5.82                      | 0.29                     | 6.11                   | 2.9E-03                     | 1.5E-04                    | 3.1E-03                   | 2.9E-03                     | 1.5E-04                     | 3.1E-03                     |
| GF-1 Tank 3    | AT-20          | Vertical Fixed Roof | Aluminum/Specular  | 16,400          | 16,400                        | 101              | 1,656,400                     | 10.10                     | 0.29                     | 10.39                  | 5.1E-03                     | 1.5E-04                    | 5.2E-03                   | 5.1E-03                     | 1.5E-04                     | 5.2E-03                     |
| GF-1 Tank 4    | S2501          | Vertical Fixed Roof | Aluminum/Specular  | 16,400          | 16,400                        | 14.5             | 237,800                       | 3.13                      | 0.29                     | 3.42                   | 1.6E-03                     | 1.5E-04                    | 1.7E-03                   | 1.6E-03                     | 1.5E-04                     | 1.7E-03                     |
| GF-1 Tank 5    | S2501M         | Vertical Fixed Roof | Aluminum/Specular  | 16,400          | 16,400                        | 14.5             | 237,800                       | 3.13                      | 0.29                     | 3.42                   | 1.6E-03                     | 1.5E-04                    | 1.7E-03                   | 1.6E-03                     | 1.5E-04                     | 1.7E-03                     |
| GF-2 Tank 1    | S2501          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 38.5             | 500,500                       | 6.23                      | 0.29                     | 6.52                   | 3.1E-03                     | 1.5E-04                    | 3.3E-03                   | 3.1E-03                     | 1.5E-04                     | 3.3E-03                     |
| GF-2 Tank 2    | AT-20N         | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 3.8              | 49,400                        | 0.65                      | 0.29                     | 0.94                   | 3.3E-04                     | 1.5E-04                    | 4.7E-04                   | 3.3E-04                     | 1.5E-04                     | 4.7E-04                     |
| GF-2 Tank 3    | S692           | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 4.8              | 62,400                        | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |
| GF-2 Tank 4    | S901N          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 12               | 156,000                       | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |
| GF-2 Tank 5    | S9010          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 12               | 156,000                       | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |
| GF-2 Tank 6    | S692N          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 21               | 273,000                       | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |
| GF-2 Tank 7    | S692N          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 21               | 273,000                       | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |
| GF-2 Tank 8    | S2501          | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 38.5             | 500,500                       | 6.23                      | 0.29                     | 6.52                   | 3.1E-03                     | 1.5E-04                    | 3.3E-03                   | 3.1E-03                     | 1.5E-04                     | 3.3E-03                     |
| GF-2 Tank 9    | DEV-5204E25    | Vertical Fixed Roof | Aluminum/Specular  | 13,000          | 13,000                        | 14.7             | 191,100                       | negl.                     | negl.                    | negl.                  | negl.                       | negl.                      | negl.                     | negl.                       | negl.                       | negl.                       |

"negl." = negligible

Total 43.43 0.02 0.02 Vinyl Acetate
### Appendix A: Emission Calculations

#### Storage Tanks

**VOC and HAPs**

- **Company Name:** Avery Dennison
- **Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140
- **Significant Source Mod. No:** 059-43441-00018
- **Significant Permit Mod. No:** 059-43443-00018
- **Reviewer:** Paul Jump


<table>
<thead>
<tr>
<th>Storage Tank ID</th>
<th>Tank Type</th>
<th>Tank Color/ Shade</th>
<th>Tank Dimensions</th>
<th>Maximum Liquid Volume (gallons)</th>
<th>Product Throughput (gallons/yr)</th>
<th>VOC Working Losses (lbs/yr)</th>
<th>VOC Breathing Losses (lbs/yr)</th>
<th>Total VOC Losses (lbs/yr)</th>
<th>VOC Working Losses (tons/yr)</th>
<th>VOC Breathing Losses (tons/yr)</th>
<th>Total VOC Losses (tons/yr)</th>
<th>HAP Working Losses (tons/yr)</th>
<th>HAP Breathing Losses (tons/yr)</th>
<th>Total HAP Losses (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GF-3 Tank 1</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 2</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 3</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 4</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 5</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 6</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>GF-3 Tank 7</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>Height: 16.67' Diameter: 12'</td>
<td>13,500</td>
<td>8</td>
<td>108000</td>
<td>8.21</td>
<td>4.34</td>
<td>12.55</td>
<td>0.004</td>
<td>0.002</td>
<td>0.006</td>
<td>1.654E-04</td>
<td>8.739E-05</td>
</tr>
<tr>
<td>Waste Water Tank</td>
<td>Vertical Fixed Roof</td>
<td>Aluminum</td>
<td>10,000</td>
<td>18.2</td>
<td>182000</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
</tr>
</tbody>
</table>

| Total | 87.52 | 0.04 | 0.002 | Vinyl Acetate |

*"negl." = negligible*
Appendix A: Emission Calculations
Abrasive Blasting

Company Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No: 059-43441-00018
Significant Permit Mod. No: 059-43443-00018
Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Air Flow Rate (cfm)</th>
<th>Grain Loading (gr/dscf)</th>
<th>Control Efficiency (%)</th>
<th>Controlled PM/PM10/PM2.5 Emissions</th>
<th>Uncontrolled PM/PM10/PM2.5 Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>lb/hr</td>
<td>lb/day</td>
</tr>
<tr>
<td>90</td>
<td>0.01</td>
<td>99%</td>
<td>0.01</td>
<td>0.19</td>
</tr>
</tbody>
</table>

The shot blasting unit is used only for maintenance purposes and is operated infrequently.

The particulate matter emissions from the shot blaster, due to its operational limitations, can not exceed the exemption thresholds of less than 5 tons per year of PM/PM10/PM2.5.

**Methodology**
Controlled Emissions:
\[
\text{PM/PM10/PM2.5 (lb/hr)} = \text{Grain Loading (gr/dscf)} \times \text{Air Flow Rate (cfm)} \times 1\text{ lb/7,000 gr } \times 60\text{ min/hr}
\]
\[
\text{PM/PM10/PM2.5 (lb/day)} = \text{PM/PM10/PM2.5 Emissions (lb/hr)} \times 24\text{ hr/day}
\]
\[
\text{PM/PM10/PM2.5 (ton/yr)} = \text{PM/PM10/PM2.5 Emissions (lb/hr)} \times 8760\text{ hr/yr } \times 1\text{ ton/2000 lb}
\]

Uncontrolled Emissions = Controlled Emissions x 1/(1 - Control Efficiency)
Appendix A: Emission Calculations
Cooling Towers
Particulate Matter

Company Name:   Avery Dennison
Source Address:   870 West Anderson Blvd., Greenfield, IN 46140
Significant Source Mod. No: 059-43441-00018
Significant Permit Mod. No: 059-43443-00018
Reviewer:   Paul Jump

Silicon Batching  =  15  lbs/day
                     =  2.74  tons/yr
### Appendix A: Emission Calculations

**Slitter Emission Calculations**

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (tons/yr)</th>
<th>Emission Rate</th>
<th>Uncontrolled Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slitter</td>
<td>193.44</td>
<td>0.10%</td>
<td>0.19</td>
</tr>
</tbody>
</table>

**Methodology**

PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Throughput (tons of trim waste/yr) x Emission Factor  
Emission Factor is based on industry standard for percent of trim material that is dust: 0.10% by weight.
### Appendix A: Emissions Calculations

#### Natural Gas Combustion Only

**MM BTU/HR <100**

**Natural Gas-Fired G3 and G4 Hot Water Heaters**

**Company Name:** Avery Dennison  
**Source Address:** 870 West Anderson Blvd., Greenfield, IN 46140  
**Significant Source Mod. No:** 059-43441-00018  
**Significant Permit Mod. No:** 059-43443-00018  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Number of Units</th>
<th>Unit Heat Input Capacity (MMBtu/hr)</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>G3 Hot Water</td>
<td>2</td>
<td>0.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.6</td>
</tr>
<tr>
<td>G4 Hot Water</td>
<td>1</td>
<td>0.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MMBtu/hr</td>
<td>mmBtu mmCF/yr</td>
</tr>
<tr>
<td>G3 Hot Water</td>
<td>1.6</td>
<td>1020</td>
</tr>
<tr>
<td>G4 Hot Water</td>
<td>0.5</td>
<td>4.29</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>PM*</td>
<td>1.9</td>
</tr>
<tr>
<td></td>
<td>PM10*</td>
<td>7.6</td>
</tr>
<tr>
<td></td>
<td>direct PM2.5*</td>
<td>7.6</td>
</tr>
<tr>
<td></td>
<td>SO2</td>
<td>0.6</td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>0.04</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>5.5</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>84</td>
</tr>
<tr>
<td>G3 Hot Water</td>
<td>0.01</td>
<td>0.05</td>
</tr>
<tr>
<td>G4 Hot Water</td>
<td>0.004</td>
<td>0.016</td>
</tr>
</tbody>
</table>

**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, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Potential (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### HAPS Calculations

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E-00</td>
<td>3.4E-03</td>
<td>3.4E-03</td>
<td>1.3E-02</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4E-05</td>
<td>8.2E-06</td>
</tr>
<tr>
<td>5.2E-04</td>
<td>1.2E-02</td>
</tr>
<tr>
<td>2.3E-05</td>
<td>1.3E-02</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>3.8E-05</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.4E-06</td>
</tr>
<tr>
<td>7.6E-06</td>
</tr>
<tr>
<td>9.6E-06</td>
</tr>
<tr>
<td>2.6E-06</td>
</tr>
<tr>
<td>1.4E-05</td>
</tr>
</tbody>
</table>

**Methodology**

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Worst HAP**

Hexane 1.2E-02
### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (ton/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>90.0</td>
<td>1.0</td>
<td>90.0</td>
<td>16.0</td>
<td>1440.0</td>
<td>810</td>
<td>0.153</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>90.0</td>
<td>1.0</td>
<td>90.0</td>
<td>40.0</td>
<td>3600.0</td>
<td>810</td>
<td>0.153</td>
</tr>
<tr>
<td>Totals</td>
<td>180.0</td>
<td>5040.0</td>
<td>27.6</td>
<td>10079.0</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip = 28.0 tons/trip**

**Average Miles Per Trip = 0.15 miles/trip**

**Unmitigated Emission Factor, \( E_f = \left[ k \cdot (sL)^{0.91} \cdot (W)^{1.02} \right] \) (Equation 1 from AP-42 13.2.1)**

- \( k = 0.011 \) 0.0022 \( 0.000054 \) \( \text{lb/VMT} = \text{particle size multiplier (AP-42 Table 13.2.1-1)} \)
- \( W = 28.0 \) 28.0 28.0 \( \text{tons} = \text{average vehicle weight} \)
- \( sL = 9.7 \) 9.7 9.7 \( \text{g/m}^2 = \text{silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) } \)

**Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E_f \cdot \left[ 1 - \frac{p}{4N} \right] \) (Equation 2 from AP-42 13.2.1)**

- \( p = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
- \( N = 365 \) days per year

**Mitigated Emission Factor, \( E_{ext} = 2.380 \) 0.476 0.1168 \( \text{lb/mile} \)**

**Methodology**

- **Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (ton/trip) * (Maximum trips per day (trip/day)) / [Maximum one-way distance (miles/trip)]**
- **PM = Particulate Matter**
- **PM10 = Particulate Matter (<10 um)**
- **PM2.5 = Particulate Matter (<2.5 um)**
- **Average Vehicle Weight Per Trip (ton/trip) = Total Weight driven per day (ton/day) / Maximum trips per day (trip/day)**
- **Average Miles Per Trip (miles/trip) = Maximum one-way miles (miles/day) / Maximum trips per day (trip/day)**
- **Unmitigated PTE (ton/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)**
- **Mitigated PTE (Before Control) (ton/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)**

**Abbreviations**

- **PM** = Particulate Matter
- **PM10** = Particulate Matter (<10 um)
- **PM2.5** = Particulate Matter (<2.5 um)
- **PTE** = Potential to Emit
Re: Public Notice
Avery Dennison
Permit Level: Title V-Significant Source
Modification (Minor PSD/EO)
Title V-Significant Permit Modification
Permit Number: 059-43441-00018 &
059-43443-00018

Dear Mr. Tyler Nestleroad:

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/](http://www.in.gov/apps/idem/caats/). Choose Search Option by Permit Number, then enter permit 43441 & 43443

and

IDEM's Virtual File Cabinet (VFC): [http://www.IN.gov/idem](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](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 Hancock Public Library, 900 West McKenzie Road in Greenfield, IN 46140. 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 Paul Jump, 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 4-6555 or dial (317) 234-6555.

Sincerely,

**Kathy Bourquein**

Kathy Bourquein  
Permits Branch  
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 7, 2021

To: Hancock 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: Avery Dennison
Permit Number: 059-43441-00018 & 059-43443-00018

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 Smiddle-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
Notice of Public Comment

January 7, 2021
Avery Dennison
059-43441-00018 & 059-43443-00018

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
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 7, 2021

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

Permit Number: 059-43441-00018 & 059-43443-00018
Applicant Name: Avery Dennison
Location: Greenfield, Hancock 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.
**Mail Code 61-53**

<table>
<thead>
<tr>
<th>IDEM Staff</th>
<th>KBOURQUE</th>
<th>January 7, 2021</th>
<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name and address of Sender</strong></td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td><strong>Type of Mail:</strong></td>
<td>CERTIFICATE OF MAILING ONLY</td>
</tr>
</tbody>
</table>

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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
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<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
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<tr>
<td>1</td>
<td></td>
<td>Tyler Nestleroad Avery Dennison 870 W Anderson Blvd Greenfield IN 46140 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>2</td>
<td></td>
<td>Remi Osseni Plant Manager Avery Dennison 870 W Anderson Blvd Greenfield IN 46140 (RO CAATS)</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3</td>
<td></td>
<td>Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)</td>
<td></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>4</td>
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<td>Hancock County Public Library 900 W McKenzie Rd Greenfield IN 46140-1741 (Library)</td>
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<tr>
<td>5</td>
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<td>Hancock County Health Department 111 American Legion Pl, Rm 150 Greenfield IN 46140-2365 (Health Department)</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>6</td>
<td></td>
<td>Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)</td>
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<td>Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd., #560-W Indianapolis IN 43240 (Consultant)</td>
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<td>Spring Lake Town Council 2972 West Sycamore Drive Greenfield IN 46140 (Local Official)</td>
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<td>Scott Underwood The Herald Bulletin 1133 Jackson St Anderson IN 46016 (Affected Party)</td>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

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