NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal and Significant Source Modification for Part 70 Operating Permit for Multi-Color Corporation in Scott County

Part 70 Operating Permit Renewal No.: T143-43290-00007
Significant Source Modification No.: 143-43360-00007

The Indiana Department of Environmental Management (IDEM) has received an application from Multi-Color Corporation, located at 2281 South U.S. 31 Scottsburg, IN 47170, for a significant source modification and renewal of its Part 70 Operating Permit issued on June 23, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Multi-Color Corporation to make certain changes at its existing source. Multi-Color Corporation has applied to add new emission units.

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:

Scott County Public Library
108 South Main Street
Scottsburg, IN 47170

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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 T143-43290-00007 and SSM 143-43360-00007 in all correspondence.

Comments should be sent to:

Shelby O’Neal
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Shelby O’Neal or (317) 233-8578
Or dial directly: (317) 233-8578
Fax: (317) 232-6749 attn: Shelby O’Neal
E-mail: Soneal@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](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](http://www.in.gov/idem/6900.htm).

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Shelby O’Neal of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Dear Aron Kratly:

Multi-Color Corporation was issued Part 70 Operating Permit No. T143-36702-00007 on June 23, 2016 for a stationary packaging rotogravure printing operation located at 2281 S. U.S. 31. An application to modify the source was received on September 21, 2020. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved for construction in 2021, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#6, with a maximum design capacity of 12.210 MMBtu/hr, exhausting through one (1) stack identified as S-OXD6.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

(b) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-
DRAFT

20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit
3.

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction
4.

Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct and Operate
6. Pursuant to 326 IAC 2-7-10.5(h)(2) this Significant Source Modification authorizes the construction of the new emission unit(s) when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source’s Part 70 Operating Permit to incorporate the required operation conditions.

For the purposes of this permitting action, the Significant Source Modification has been combined with the current Part 70 Operating Permit Renewal.

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 Shelby O'Neal, 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) 233-8578 or (800) 451-6027, and ask for Shelby O'Neal or (317) 233-8578.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - Scott County
    Scott County Health Department
    U.S. EPA, Region 5
    Compliance and Enforcement Branch
    IDEM Southeast Regional Office
Significant Source Modification
to a Part 70 Source

OFFICE OF AIR QUALITY

Multi-Color Corporation
2281 South U.S. 31
Scottsburg, Indiana 47170

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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. This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

<table>
<thead>
<tr>
<th>Significant Source Modification No.: 143-43360-00007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agency Interest ID.: 12010</td>
</tr>
</tbody>
</table>

Issued by:

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
# TABLE OF CONTENTS

## SECTION A  SOURCE SUMMARY

| A.1 | General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)] |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)] |
| A.3 | Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)] |
| A.4 | Part 70 Permit Applicability [326 IAC 2-7-2] |

## SECTION B  GENERAL CONDITIONS

| B.1 | Definitions [326 IAC 2-7-1] |
| 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)] |
| B.3 | Term of Conditions [326 IAC 2-1.1-9.5] [IC 13-17-12] |
| B.4 | Enforceability [326 IAC 2-7-7] [IC 13-17-12] |
| B.5 | Severability [326 IAC 2-7-5(5)] |
| B.6 | Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)] |
| B.7 | Duty to Provide Information [326 IAC 2-7-5(6)(E)] |
| B.8 | Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)] |
| B.9 | Annual Compliance Certification [326 IAC 2-7-6(5)] |
| B.10 | Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3] |
| B.11 | Emergency Provisions [326 IAC 2-7-16] |
| B.12 | Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12] |
| B.13 | Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5] |
| B.14 | Termination of Right to Operate [326 IAC 2-7-10][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] |
| B.16 | Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)] |
| B.17 | Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72] |
| B.18 | Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)] |
| B.19 | Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5] |
| B.20 | Source Modification Requirement [326 IAC 2-7-10.5] |
| 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] |
| B.22 | Transfer of Ownership or Operational Control [326 IAC 2-7-11] |
| B.23 | Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-7-11-7] |
| B.24 | Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6] |

## SECTION C  SOURCE OPERATION CONDITIONS

| C.1 | Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] |
| C.2 | Opacity [326 IAC 5-1] |
| C.3 | Open Burning [326 IAC 4-1][IC 13-17-9] |
| C.4 | Incineration [326 IAC 4-2][326 IAC 9-1-2] |
| C.5 | Fugitive Dust Emissions [326 IAC 6-4] |
| C.6 | Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M] |

### 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]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

### Compliance Requirements [326 IAC 2-1.1-11]

- C.8 Compliance Requirements [326 IAC 2-1.1-11]
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] .......................... 22
C.9 Compliance Monitoring
[326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]
C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] .......................... 23
C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test
[326 IAC 2-7-5][326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] .................. 24
C.14 Emission Statement
[326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection ................................................................................................. 25
C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 26
Using Oxidizers for 326 IAC 8 Compliance Purpose.................................................................. 26

Emission Limitations and Standards [326 IAC 2-7-5(1)] .......................................................... 27
D.1.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]
D.1.2 Graphic Arts Operations [326 IAC 8-5-5]
D.1.3 PSD Minor Limit [326 IAC 2-2]
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements [326 IAC 2-7-5(1)] .................................................. 28
D.1.5 Volatile Organic Compounds (VOC) Control
D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.1.7 Testing Requirements [326 IAC 8-1-12]
D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11][326 IAC 8-1-12]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] ....................... 30
D.1.9 Thermal Oxidizer Temperature [40 CFR 64]
D.1.10 Thermal Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]
D.1.11 Catalytic Incinerator Temperature [40 CFR 64]
D.1.12 Catalytic Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]
D.1.13 Monitoring Requirements [326 IAC 8-1-12]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] .................. 32
D.1.14 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]
D.1.15 Record Keeping Requirements [326 IAC 8-1-12]
D.1.16 Record Keeping Requirements
D.1.17 Reporting Requirements [326 IAC 8-1-12]
D.1.18 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 35
Emission Limitations and Standards [326 IAC 2-7-5(1)] .......................................................... 36
D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.2.2 PSD Minor Limit [326 IAC 2-2]
D.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements [326 IAC 2-7-5(1)] .................................................. 37
D.2.5 Volatile Organic Compounds (VOC)
D.2.6 Volatile Organic Compounds (VOC) Control
D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] ........................................ 38

D.2.8 Catalytic Incinerator Temperature
D.2.9 Catalytic Oxidizer Duct Pressure or Fan Amperage
D.2.10 Thermal Oxidizer Temperature
D.2.11 Thermal Oxidizer Duct Pressure or Fan Amperage

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] ..................... 39
D.2.12 Record Keeping Requirement
D.2.13 Reporting Requirements

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 42

Emission Limitations and Standards [326 IAC 2-7-5(1)] ............................................................... 42
D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

SECTION E.1 NSPS ................................................................................................................................ 43

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)] ................................ 43
E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1]
[40 CFR Part 60, Subpart A]
E.1.2 Small Industrial-Commercial Institutional Steam Generating Units NSPS
[326 IAC 12] [40 CFR Part 60, Subpart Dc]

SECTION E.2 NESHAP ........................................................................................................................... 44

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)] ............................................................................................................................ 45
E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air
Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
E.2.2 Printing and Publishing Industry NESHAP [40 CFR Part 63, Subpart KK]
[326 IAC 20-18]

CERTIFICATION ................................................................................................................................. 46

EMERGENCY OCCURRENCE REPORT ............................................................................................. 47
Part 70 Quarterly Report ..................................................................................................................... 49
Part 70 Quarterly Report ..................................................................................................................... 50

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ................................. 51

Attachment A - Printing and Publishing Industry NESHAP - 40 CFR Part 63, Subpart KK
Attachment B - Small Industrial-Commercial-Institutional Steam Generating Units NSPS - 40 CFR
Part 60, Subpart Dc
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.4 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 packaging rotogravure printing operation.

- Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
- General Source Phone Number: 812-752-8205
- SIC Code: 2754 (Commercial Printing, Gravure)
- County Location: Scott
- Source Location Status: Attainment for all criteria pollutants
- Source Status: Part 70 Operating Permit Program, Minor Source, under PSD and Emission Offset Rules, Major Source, Section 112 of the Clean Air Act, Not 1 of 28 Source Categories

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

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

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by OXD#6, exhausting through stack SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by OXD#5, exhausting through stack S-OXD5, or controlled by OXD#7, then exhausted through stack S-OXD7; or controlled by OXD#5 and OXD#7, then exhausted through stacks S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from
P5U1-P5U10 are controlled by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either OXD#6, exhausting through stack identified as S-OXD6 or are controlled by OXD#7, exhausting through stack S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

(f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, constructed in 2010, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, and:

(1) modified in 2014 to have the option of directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(2) modified in 2016 to increase the projected maximum solvent consumption rate to sixty-seven (67) gallons per day.

(i) One (1) mechanical spray cold cleaner degreaser, identified as PW6, constructed in 2015, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.
(j) One (1) manual cold cleaner degreaser, identified as PW7, constructed in 2016, with a projected maximum solvent consumption rate of twenty-four (24) gallons per day, directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(k) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(l) One (1) catalytic oxidizer, identified as OXD#5, with a maximum design capacity of 5.8 MMBtu/hr, exhausting through stack S-OXD5.

(m) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through stack S-OXD6.

(n) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(o) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, approved in 2021 for construction, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

(p) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

A.3 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, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through stack S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(c) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.

(d) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day.

(e) One (1) seaming machine, identified as Seam Mach 1, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).

(f) One (1) seaming machine, identified as Seam Mach 2, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).
(g) One (1) seaming machine, identified as Seam Mach 3, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).

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).

(c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
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, T143-43290-00007, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(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 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 Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance
causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

(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 T143-43290-00007 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, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

(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.
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.

<table>
<thead>
<tr>
<th>B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]</td>
</tr>
<tr>
<td>(c) 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 &quot;responsible official&quot; as defined by 326 IAC 2-7-1(35).</td>
</tr>
<tr>
<td>(d) 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)]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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:</td>
</tr>
</tbody>
</table>
(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.

(f) This condition does not apply to emission trades of SO₂ or NOₓ under 326 IAC 21.

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:
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

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(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.

The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

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)][40 CFR 64][326 IAC 3-8]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
The dates analyses were performed.

The company or entity that performed the analyses.

The analytical techniques or methods used.

The results of such analyses.

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.

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.

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.

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

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.

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.

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

**Using Oxidizers for 326 IAC 8 Compliance Purpose**

**Emissions Unit Description:**

<table>
<thead>
<tr>
<th>Number</th>
<th>Press Identification</th>
<th>Station Details</th>
<th>Construction Date</th>
<th>Maximum Line Speed</th>
<th>Heat Input Rate</th>
<th>Emission Control</th>
<th>Stack(s) Exhausted</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>Press #1</td>
<td>P1U1 through P1U10</td>
<td>May 1990</td>
<td>840 ft/min</td>
<td>7.76 MM Btu/h</td>
<td>OXD#6, SOXD6</td>
<td>S-OXD6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b)</td>
<td>Press #4</td>
<td>P4U1 through P4U10</td>
<td>January 2004</td>
<td>800 ft/min</td>
<td>5.0 MM Btu/h</td>
<td>OXD#5, S-OXD5, S-OXD7</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(c)</td>
<td>Press #5</td>
<td>P5U1 through P5U10</td>
<td>2013</td>
<td>1600 ft/min</td>
<td>1066 ft/min</td>
<td>OXD#7, S-OXD7</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(d)</td>
<td>Press #6</td>
<td>P6U1 through P6U11</td>
<td>2019</td>
<td>1600 ft/min</td>
<td>1066 ft/min</td>
<td>OXD#6, S-OXD6, S-OXD7</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(e)</td>
<td>Press #7</td>
<td>P7U1 through P7U10</td>
<td>2021</td>
<td>1640 ft/min</td>
<td>1066 ft/min</td>
<td>OXD#6, S-OXD6, S-OXD8</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4 (ten stations: P4U1 through P4U10) are considered a new affected source.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (ten stations: P6U1 through P6U10) are considered a new affected source.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #7 (ten stations: P7U1 through P7U10) are considered a new affected source.
Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.

(2) The natural gas fired regenerative thermal oxidizer identified as OXD#6 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.

(3) The natural gas fired regenerative thermal oxidizer identified as OXD#7 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.

(d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting
Requirements for Certain Coating Facilities Using Control Devices, the presses #1, #4, #5, #6, and #7 are subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

1. Each incineration control system shall be operated and maintained according to the manufacturer’s recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.

2. A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5(f), work practices for Presses #1, #4, #5, #6, and #7 shall include, but not be limited to, the following:

(a) When not in use, all cleaning materials shall be kept in closed containers.

(b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.1.3 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 total input of VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, and P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (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.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.5 Volatile Organic Compounds (VOC) Control

In order to assure compliance with Conditions D.1.1 and D.1.3, the catalytic oxidizer OXD#5 and thermal oxidizers OXD#6 and OXD#7 shall be in operation and control emissions from the associated presses at all times the associated presses are in operation.

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

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied” VOC data.
sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures;

(2) Operating and control system parameters;

(3) Type of VOC containing process material being used; and

(4) The process and control system parameters that will be monitored during the test.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 8-1-12]

(a) In order to demonstrate compliance with Condition D.1.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#5, controlling Press #4, not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner.

(b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#6 (controlling Press #1, Press #6, and Press #7) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

(c) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#7 (controlling Press #4, Press #5, and Press #6) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

(d) In order to demonstrate compliance with Condition D.1.3, not later than 180 days after
startup of Press #7, the Permittee shall conduct VOC control efficiency (as the product of
destruction efficiency and capture efficiency) testing on OXD#6 (controlling Press #1,
Press #6, and Press #7) and OXD#8. The test shall be repeated at least once every two
and one-half (2.5) years from the date of the most recent compliance demonstration.

(e) Not later than 180 days after the startup of OXD#8 the Permittee shall perform VOC
testing of the OXD#8 utilizing methods approved by the commissioner at least once every
2.5 years from the date of the most recent valid compliance demonstration.

(f) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source
Sampling Procedures). Section C – Performance Testing contains the Permittee’s
obligation with regard to the performance testing required by this condition.

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

<table>
<thead>
<tr>
<th>D.1.9 Thermal Oxidizer Temperature [40 CFR 64]</th>
</tr>
</thead>
</table>
| (a) A continuous monitoring system shall be calibrated, maintained, and operated on
| OXD#6, OXD#7, and OXD#8 for measuring combustion zone temperature. For the
| purpose of this condition, continuous means no less often than once per fifteen (15)
| minutes. The output of the temperature monitoring system shall be recorded as a 3-hour
| average. From the date of startup of OXD#8 until the stack test results are available, the
| Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature
| of 1,400°F.
| (b) The Permittee shall determine the 3-hour average temperatures from the latest valid
| stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.3.
| (c) On and after the date the stack test results are available, the Permittee shall operate the
| thermal oxidizers at or above the 3-hour average outlet temperatures as observed during
| the latest compliant stack test.
| (d) If the 3-hour average temperature falls below the above mentioned 3-hour average
| temperature, the Permittee shall take a reasonable response. Section C - Response to
| Excursions or Exceedances contains the Permittee’s obligation with regard to the
| response steps required by this condition. A 3-hour average temperature that is below
| the temperature determined in the most recent compliance test is not a deviation from
| this permit. Failure to take response steps shall be considered a deviation from this
| permit.

D.1.10 Thermal Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]

|------------------------------------------------|
| (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the
| latest valid stack test that demonstrates compliance with limits in Conditions D.1.1 and
| D.1.3.
| (b) The duct pressure or fan amperage shall be observed at least once per day when the
| thermal oxidizers, identified as OXD#6, OXD#7, and/or OXD#8 are in operation. On and
| after the date the stack test results are available, the duct pressure or fan amperage shall
| be maintained within the normal range as established in latest compliant stack tests.
| (c) When, for any one reading, the duct pressure or fan amperage is outside the above
| mentioned range, the Permittee shall take a reasonable response. Section C - Response to
| Excursions and Exceedances contains the Permittee's obligation with regard to the
| reasonable response steps required by this condition. A reading that is outside the above
| mentioned range is not a deviation from this permit. Failure to take response steps shall
| be considered a deviation from this permit.
(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

D.1.11 Catalytic Incinerator Temperature [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#2 and OXD#5 for measuring catalyst bed inlet and outlet temperatures. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.3.

(c) On and after the date the stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the 3-hour average catalyst bed inlet and outlet temperatures as observed during the latest compliant stack test.

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

D.1.12 Catalytic Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizers, identified as OXD#5 and OXD#2, are in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

D.1.13 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

(a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an
accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate; and

(b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

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

D.1.14 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.15 Record Keeping Requirements [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.1.9 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;

(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.16 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.

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

(2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.

(3) A log of the dates of use;

(4) The total VOC usage for each month at each press;

(5) The weight of VOCs emitted for each compliance period for each press.
(b) To document the compliance status with Condition D.1.10, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizers (OXD#6, OXD#7, and OXD#8). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.1.12, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (OXD#5). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(d) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.17 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

1. Name and location of the coating facility;
2. Identification of the control system where the noncompliance occurred and the coating facility it served;
3. Time, date and duration of the noncompliance; and

(b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.1.18 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations 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).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, constructed in 2010, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, and:
   (1) modified in 2014 to have the option of directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.
   (2) modified in 2016 to increase the projected maximum solvent consumption rate to sixty-seven (67) gallons per day.

(i) One (1) mechanical spray cold cleaner degreaser, identified as PW6, constructed in 2015, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(j) One (1) manual cold cleaner degreaser, identified as PW7, constructed in 2016, with a projected maximum solvent consumption rate of twenty-four (24) gallons per day, directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(k) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(n) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(o) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

(p) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with...
one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 PSD Minor Limit [326 IAC 2-2]

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

(a) The total VOC usage at PW3 through PW8 shall be limited to 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (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.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the solvent manufacturer.

D.2.6 Volatile Organic Compounds (VOC) Control

(a) In order to assure compliance with Condition D.2.2, the catalytic oxidizer OXD#2 or OXD#8 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#2 or OXD#8.

(b) In order to assure compliance with Condition D.2.2, the thermal oxidizer OXD#7 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#7.

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.2.2, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#2 not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner.
(b) In order to demonstrate compliance with Condition D.2.2, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7 not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner.

(c) Not later than 180 days after the startup of OXD#8 the Permittee shall perform VOC testing of the OXD#8 utilizing methods approved by the commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

(d) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

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

D.2.8 Catalytic Incinerator Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#2 and OXD#8 for measuring catalyst bed inlet and outlet temperatures. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of startup of OXD#8 until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the latest valid stack test that demonstrates compliance with limits in Condition D.2.2.

(c) On and after the date the stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the 3-hour average catalyst bed inlet and outlet temperatures as observed during the latest compliant stack test.

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

D.2.9 Catalytic Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.2.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer, identified as OXD#2, is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

D.2.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#7 or OXD#8 for measuring combustion zone temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of the temperature monitoring system shall be recorded as a 3-hour average.

(b) The Permittee shall determine the 3-hour average temperatures from the latest valid stack test that demonstrates compliance with limits in Condition D.2.2.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3-hour average outlet temperatures as observed during the latest compliant stack test.

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

D.2.11 Thermal Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.2.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer, identified as OXD#7 or OXD#8, is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack tests.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

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

D.2.12 Record Keeping Requirement

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.2.
(1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use.

(3) The cleanup solvent usage for each month.

(4) The total VOC usage in parts washer PW3 through PW8 for each month.

(5) The weight of VOC emitted for each compliance period.

(6) The following operation parameters of the catalytic oxidizer incinerator and thermal oxidizer:

(A) VOC capture efficiency;

(B) VOC destruction efficiency of the control devices;

(C) A description of the data used to establish the capture and destruction efficiencies; and

(D) Continuous temperature readings.

(b) To document the compliance status with Condition D.2.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(1) The name and address of the solvent supplier.

(2) The date of purchase.

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) To document the compliance status with Condition D.2.9, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (OXD#2). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(d) To document the compliance status with Condition D.2.11, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers (OXD#7 and OXD#8). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).
(e) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.2.13 Reporting Requirements
A quarterly summary of the information to document the compliance status with Condition D.2.2 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations 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).
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through stack S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

(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.3.1 Particulate Emission Limitations for Sources of Indirect Heating [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 10.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for this facility. 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) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through stack S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

(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)]**

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(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 Dc.

(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 Small Industrial-Commercial Institutional Steam Generating Units NSPS [326 IAC 12] [40 CFR Part 60, Subpart Dc]

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

1. 40 CFR 60.40c(a), (b), (c), and (d);
2. 40 CFR 60.41c;
3. 40 CFR 60.48c(a), (a)(1), (a)(3), (g), and (i).
Emissions Unit Description:

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by OXD#6, exhausting through stack SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by OXD#5, exhausting through stack S-OXD5, or controlled by OXD#7, then exhausted through stack S-OXD7; or controlled by OXD#5 and OXD#7, then exhausted through stacks S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either OXD#6, exhausting through stack S-OXD6 or are controlled by OXD#7, exhausting through stack S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10) are considered a new affected source.
stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an 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 KK.

   (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 Printing and Publishing Industry NESHAP [40 CFR Part 63, Subpart KK] [326 IAC 20-18]

   The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart KK (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-18, for the emission unit(s) listed above:

   (1) 40 CFR 63.820(a);
   (2) 40 CFR 63.821;
   (3) 40 CFR 63.822;
   (4) 40 CFR 63.823;
   (5) 40 CFR 63.825;
   (6) 40 CFR 63.826(a) and (c);
   (7) 40 CFR 63.827;
   (8) 40 CFR 63.828;
   (9) 40 CFR 63.829, except 40 CFR 63.829(f);
   (10) 40 CFR 63.830;
   (11) 40 CFR 63.831.
ININDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007

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: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007

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

| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007
Facility: Presses #1, #4, #5, #6 and #7 emission units P1U1-10, P4U1-10, P5U1-10, P6U1-U11, and P7U1-11
Parameter: VOC Usage
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presses #1, #4, #5, #6, and #7</td>
<td>VOC Press Lines #1, #4, #5, #6, and #7</td>
<td>VOC Press Lines #1, #4, #5, #6, and #7</td>
<td>VOC Press Lines #1, #4, #5, #6, and #7</td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</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: ___________________________________________________________
Multi-Color Corporation
Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007
Facility: Parts Washers PW3, PW4, PW5, PW6, PW7, and PW8
Parameter: VOC Usage
Limit: The total VOC usage at PW3 through PW8 shall be limited to 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>VOC PW3, PW4, PW5, PW6, PW7, and PW8</td>
<td>VOC PW3, PW4, PW5, PW6, PW7, and PW8</td>
<td>VOC PW3, PW4, PW5, PW6, PW7, and PW8</td>
</tr>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</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: Multi-Color Corporation  
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170  
Part 70 Permit No.: T143-43290-00007

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>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:
<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________

Title / Position: ___________________________________________________________

Date: ___________________________________________________________________

Phone: _________________________________________________________________
Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Multi-Color Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>2281 South U.S. 31 Scottsburg, IN 47170</td>
</tr>
<tr>
<td>County:</td>
<td>Scott</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2754 (Commercial Printing, Gravure)</td>
</tr>
<tr>
<td>Permit Renewal No.:</td>
<td>T143-43290-00007</td>
</tr>
<tr>
<td>Significant Modification No.:</td>
<td>143-43360-00007</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Shelby O'Neal</td>
</tr>
</tbody>
</table>

On September 21, 2020, Multi-Color Corporation submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Multi-Color Corporation relating to the operation of a stationary packaging rotogravure printing operation. Multi-Color Corporation was issued its third Part 70 Operating Permit Renewal (T143-43290-00007) on June 23, 2016.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T143-36702-00007 on June 23, 2016. The source has since received the following approval:

(a) Administrative Amendment No. 143-40893-00007, issued on February 14, 2019; and
(b) Significant Source Modification No. 143-41062-00007, issued on August 1, 2019.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by OXD#6, exhausting through stack SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by OXD#5, exhausting through stack S-OXD5, or controlled by OXD#7, then exhausted through
stack S-OXD7; or controlled by OXD#5 and OXD#7, then exhausted through stacks S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either OXD#6, exhausting through stack identified as S-OXD6 or are controlled by OXD#7, exhausting through stack S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) mechanical spray cold cleaner degreaser, identified as PW3, constructed in 2010, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(f) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(g) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, and:

1. modified in 2014 to have the option of directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

2. modified in 2016 to increase the projected maximum solvent consumption rate to sixty-seven (67) gallons per day.

(h) One (1) mechanical spray cold cleaner degreaser, identified as PW6, constructed in 2015, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.
(i) One (1) manual cold cleaner degreaser, identified as PW7, constructed in 2016, with a projected maximum solvent consumption rate of twenty-four (24) gallons per day, directing emissions to either OXD#2, exhausting through stack S-OXD2 or OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(j) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through stack S-OXD6.

(k) One (1) catalytic oxidizer, identified as OXD#5, with a maximum design capacity of 5.8 MMBtu/hr, exhausting through stack S-OXD5.

(l) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(m) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

---

**Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

(a) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected maximum solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

---

**Insignificant Activities**

The source also consists of the following insignificant activities:

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through stack S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(c) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.

(d) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day.

(e) One (1) seaming machine, identified as Seam Mach 1, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).

(f) One (1) seaming machine, identified as Seam Mach 2, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).
One (1) seaming machine, identified as Seam Mach 3, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 500 meters per minute (mpm).

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Scott 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 August 3, 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. Scott 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
Scott 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
Scott 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).
On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as ‘Major’ based solely on greenhouse gas emissions."

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

### Source Status - Existing Source

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

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>0.46</td>
<td>1.83</td>
<td>1.83</td>
<td>0.14</td>
<td>24.07</td>
<td>221.58</td>
<td>20.22</td>
<td>&gt;10</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</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>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of SSM No.143-41061-00007, issued on August 1, 2019.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Multi-Color Corporation on September 21, 2020, relating to the following:
The addition of new emission units.
The source has stated thermal oxidizers OXD#6 and OXD#7 are 12.21 MMBtu/hr, each. OXD#6 and OXD#7 were previously permitted incorrectly at 9 MMBtu/hr.
Seaming machine 1’s maximum run speed is 500 meters per minute.
The addition of a new oxidizer identified as OXD#8.

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

(a) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

(b) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(c) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, approved in 2021 for construction, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

The following thermal oxidizers were previously listed with an incorrect heat input capacity:

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by OXD#6, exhausting through stack SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

*During Renewal application process, the source realized the maximum capacity for Press #1 was incorrectly reported. According to the manufacturer specification sheet the unit’s maximum capacity should be 12.21 MMBtu/hr and not 9 MMBtu/hr.

(b) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either OXD#6, exhausting through stack identified as S-OXD6 or are controlled by OXD#7, exhausting through stack S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.
During Renewal application process, the source notified IDEM that the maximum capacity for Press #6 was previously incorrect. According to the manufacturer specification sheet the unit's maximum capacity should be 12.21 MMBtu/hr and not 9 MMBtu/hr.

**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&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&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>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #7</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>17,417.92</td>
<td>-</td>
<td>&gt;25</td>
<td></td>
</tr>
<tr>
<td>Parts Washer #8</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>16.83</td>
<td>-</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>OXD#8</td>
<td>0.07</td>
<td>0.26</td>
<td>0.26</td>
<td>0.02</td>
<td>3.44</td>
<td>0.19</td>
<td>2.89</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>0.07</td>
<td>0.26</td>
<td>0.26</td>
<td>0.02</td>
<td>3.44</td>
<td>17,434.95</td>
<td>2.89</td>
<td>&gt;25</td>
</tr>
</tbody>
</table>

PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

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.

(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. This permit requires a case-by-case determination of an emission limitation.

**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 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.
### Project Emissions (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #7*</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>190.94</td>
<td>-</td>
</tr>
<tr>
<td>Parts Washer #8</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>13.75</td>
<td>-</td>
</tr>
<tr>
<td>OXD#8</td>
<td>0.07</td>
<td>0.26</td>
<td>0.26</td>
<td>0.02</td>
<td>3.44</td>
<td>0.19</td>
<td>2.89</td>
</tr>
<tr>
<td>Total for Modification</td>
<td>0.07</td>
<td>0.26</td>
<td>0.26</td>
<td>0.02</td>
<td>3.44</td>
<td>205.71</td>
<td>2.89</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>

<sup>1</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>2</sup>This is a limit for all Press Lines combined.

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 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>Source-Wide Emissions After Issuance (ton/year)</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>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs (Toluene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>0.59</td>
<td>2.34</td>
<td>2.34</td>
<td>0.18</td>
<td>30.80</td>
<td>222.79</td>
<td>25.87</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</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>
<td>--</td>
</tr>
</tbody>
</table>

<sup>1</sup>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."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>3</sup>Single highest source-wide HAP  
<sup>4</sup>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 and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 20 (Hazardous Air Pollutants) 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 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. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for the Press Lines, because the press lines are not used in publication rotogravure printing, and is not considered a publication rotogravure printing press, as defined in 60.431. Each Press Line is a packaging rotogravure. The source prints on labels.

(b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12, are not included in the permit for the Press Lines, because the source does not manufacture pressure sensitive tape and label materials.

(c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF and 326 IAC 12, are not included in the permit for the Press Lines, because each unit does not print or coat flexible vinyl or urethane products.

(d) 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 Press Lines, because the coating operations do not perform polymeric coating of supporting substrates.

(e) 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 the isopropyl acetate storage tanks, because each tank does not have a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

(f) This source is subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional, 40 CFR 60, Subpart Dc and 326 IAC 12, because the unit has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).
The boiler, identified as TH2, is subject to the following portions of Subpart Dc.

1. 40 CFR 60.6(a), (b), (c), and (d);
2. 40 CFR 60.6c;
3. 40 CFR 60.6(a), (a)(1), (a)(3), (g), and (i).

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the unit except as otherwise specified in 40 CFR 60, Subpart Dc.

(g) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T and 326 IAC 20-6 are not included in the permit for the degreasers, since it does not use any solvent containing the following chemicals in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent:

1. methylene chloride (CAS No. 75-09-2);
2. perchloroethylene (CAS No. 127-18-4);
3. trichloroethylene (CAS No. 79-01-6);
4. 1,1,1-trichloroethane (CAS No. 71-55-6);
5. carbon tetrachloride (CAS No. 56-23-5);
6. chloroform (CAS No. 67-66-3); or
7. any combination of these halogenated HAP solvents.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18, because the Press Lines are packaging rotogravures at a major source of hazardous air pollutants (HAP).

Press Lines are subject to the following portions of Subpart KK:

1. 40 CFR 63.820(a);
2. 40 CFR 63.821;
3. 40 CFR 63.822;
4. 40 CFR 63.823;
5. 40 CFR 63.825;
6. 40 CFR 63.826(a) and (c);
7. 40 CFR 63.827;
8. 40 CFR 63.828;
9. 40 CFR 63.829, except 40 CFR 63.829(f);
10. 40 CFR 63.830; and
11. 40 CFR 63.831.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the the units except as otherwise specified in 40 CFR 63, Subpart KK.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK and 326 IAC 20-18, are not included in the permit for the seaming machines, since the units do not meet the definitions (40 CFR 63.822) of publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ, are not included in the permit for the Press Lines because the units are each considered an affected source under 40 CFR 63, Subpart KK. Pursuant to §63.3300(b), packaging rotogravures are not an affected part of the source under Subpart JJJJ if they are an affected source under Subpart KK.

(e) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**Compliance Assurance Monitoring (CAM):**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

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

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #1 / VOC</td>
<td>RTO</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Press #1 / HAP</td>
<td>RTO</td>
<td>NESHAP Subpart KK</td>
<td>&gt;10</td>
<td>&gt;10</td>
<td>N¹</td>
<td>-</td>
</tr>
<tr>
<td>Press #4 / VOC</td>
<td>RTO</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Press #4 / HAP</td>
<td>RTO</td>
<td>NESHAP Subpart KK</td>
<td>&gt;10</td>
<td>&gt;10</td>
<td>N¹</td>
<td>-</td>
</tr>
<tr>
<td>Press #5 / VOC</td>
<td>RTO</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Press #5 / HAP</td>
<td>RTO</td>
<td>NESHAP Subpart KK</td>
<td>&gt;10</td>
<td>&gt;10</td>
<td>N¹</td>
<td>-</td>
</tr>
<tr>
<td>Press #6 / VOC</td>
<td>RTO</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Press #6 / HAP</td>
<td>RTO</td>
<td>NESHAP Subpart KK</td>
<td>&gt;10</td>
<td>&gt;10</td>
<td>N¹</td>
<td>-</td>
</tr>
<tr>
<td>Press #7 / VOC</td>
<td>RTO</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Press #7 / HAP</td>
<td>RTO</td>
<td>NESHAP Subpart KK</td>
<td>&gt;10</td>
<td>&gt;10</td>
<td>N¹</td>
<td>-</td>
</tr>
<tr>
<td>PW3 / VOC</td>
<td>Catalytic Oxidizer or RTO</td>
<td>326 IAC 2-2</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>PW4 / VOC</td>
<td>Catalytic Oxidizer or RTO</td>
<td>326 IAC 2-2</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>PW5 / VOC</td>
<td>Catalytic Oxidizer or RTO</td>
<td>326 IAC 2-2</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>PW6 / VOC</td>
<td>Catalytic Oxidizer or RTO</td>
<td>326 IAC 2-2</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

N 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.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Preciptator

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to the thermal and catalytic oxidizers for Presses #1, #4, #5, #6 and #7 for VOC. A CAM plan was submitted as part of a previous permit application and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

**State Rule Applicability - Entire Source**

State rule applicability for this source has been reviewed as follows:

**326 IAC 1-6-3 (Preventive Maintenance Plan)**
The source is subject to 326 IAC 1-6-3.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**
PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance 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 total input of VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%

(c) The total VOC usage at PW3 through PW8 shall be limited to 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons.
per 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).

The operation of the Press Lines 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 Press Lines. However, pursuant to 326 IAC 2-4.1-1(b)(2), because the Press Lines are specifically regulated under NESHAP 40 CFR 63, Subpart KK, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, the Press Lines is exempt from the requirements of 326 IAC 2-4.1.

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 Scott 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 Scott County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.
State rule applicability has been reviewed as follows:

**Press Lines**

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The Press Lines are not subject to the requirements of 326 IAC 8-1-6 because each unit is regulated by other rules in 326 IAC 8. The Press Lines are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

326 IAC 8-2-5 Paper Coating Operation
Pursuant to 326 IAC 8-2-5(a), the Press Lines are excluded from 326 IAC 8-2-5 because they are packaging rotogravure processes required to meet the emission limitations contained in 326 IAC 8-5-5.

326 IAC 8-5-5 (Graphic Arts Operations)
The Press Lines are subject to 326 IAC 8-5-5(a)(2) because each unit was constructed after 1980 and has the potential to emit VOC greater than twenty-five (25) tons per year. Pursuant to 326 IAC 8-5-5(c), no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more of nonvolatile material; or

(c) The owner or operator installs and operates a control device (i.e. incineration system) that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water and utilizes a capture system that, when used in conjunction with the control device, shall attain an efficiency sufficient to achieve an overall VOC control efficiency of sixty-five percent (65%); and

(d) The ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.

The Press Lines are subject to 326 IAC 8-5-5(d)(2) because each was constructed after July 1, 1990 and has the potential to emit VOC greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-5-5(e)(1)(B) a capture system must be used in conjunction with the emission control system specified in 326 IAC 8-5-5(c)(3). For these packaging rotogravure processes, the capture system shall attain an efficiency sufficient to achieve an overall control efficiency of sixty-five percent (65%).

Pursuant to 326 IAC 8-5-5(f), work practices for Press Lines shall include, but not be limited to, the following:

(a) When not in use, all cleaning materials shall be kept in closed containers.

(b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

326 IAC 8-1-12 (Compliance certification, record keeping, and reporting requirements for certain coating facilities using control devices)*
The Press Lines are subject to 326 IAC 8-1-12 because each unit uses a control device to comply with volatile organic compounds emission limits and meets the applicability criteria of 326 IAC 8-5-5(a)(2).

Upon startup of a new coating facility, the owner or operator of the coating facility shall comply with the following requirements:
Control system operation, maintenance, and testing requirements shall be as follows:

(A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.

(B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.

(C) The control system shall be tested according to the following schedule and in the following situations:

(i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(iii) A compliance test shall be performed within ninety (90) days of:

( AA) startup of a new coating facility;

( BB) changing the method of compliance for an existing coating facility from compliant coatings or dailyweighted averaging to control devices; or

( CC) receipt of a written request from the department or the U.S. EPA.

(D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(i) Test procedures.

(ii) Operating and control system parameters.

(iii) Type of VOC containing process material being used.

(iv) The process and control system parameters that will be monitored during the test.

Monitoring equipment requirements shall be as follows:

(A) If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

(B) If a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.
(C) If a carbon adsorber is used to remove and recover VOC from the gas stream, a VOC monitoring device capable of continuously recording the concentration level of VOC at the outlet of the carbon bed shall be used. The monitoring device shall be based on a detection principle such as infrared, photoionization, or thermal conductivity.

(D) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.

Pursuant to 326 IAC 8-1-12(c), on and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliant coatings or daily-weighted averaging to control devices, the owner or operator of a coating facility identified in subsection (a) shall collect and record each day and maintain all of the following information each day for each coating facility:

(1) The name and identification number of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C).

(6) Control device monitoring data as follows:

(A) For thermal incinerators, the following:

   (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.

   (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For catalytic incinerators, the following:

   (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.

   (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance.

   (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%)
of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

*Note: In order to comply with the requirements of 326 IAC 8-5-5, the source can either use compliant coatings, as shown in the permit under Section D.1, or the source can use oxidizers, as shown in the permit under Section D.2.

Seaming Machines

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the seaming machines were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Degreasers

326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2(a), the cold parts washer meets the definition of a cold cleaner degreasing operation. The emission unit was constructed after July 1, 1990 and is not equipped with a remote solvent reservoir. Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the control equipment and operating requirements are met as specified in the permit.

326 IAC 8-3-8 (Material Requirements for Cold Degreasers)
326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufacturers solvent for use in cold cleaner degreasers.

Boiler (TH2)

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

\[ Pt = \frac{1.09}{Q^{0.26}} \]

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(1), the natural-gas fired boilers are not subject to the requirements of 326 IAC 6-3, since combustion for indirect heating is an exempt process.

Storage Tanks

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

Even though, the isopropyl acetate storage tanks were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) are not included in the permit for the storage tank because the source is not located in Clark, Floyd, Lake, or Porter County.

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 source are as follows:

Testing Requirements:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Testing or Date of Initial Validation Demonstration</th>
<th>Pollutant/Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #1</td>
<td>OXD#6</td>
<td>June 3, 2020</td>
<td>Overall VOC Control Efficiency</td>
<td>Every 2.5 years</td>
<td>326 IAC 2-2 326 IAC 8-5-5 326 IAC 8-1-12</td>
</tr>
<tr>
<td>Press #4</td>
<td>OXD#5</td>
<td>June 4, 2020</td>
<td></td>
<td></td>
<td>326 IAC 2-2 326 IAC 8-5-5 326 IAC 8-1-12</td>
</tr>
<tr>
<td></td>
<td>OXD#7</td>
<td></td>
<td></td>
<td></td>
<td>326 IAC 2-2 326 IAC 8-5-5 326 IAC 8-1-12</td>
</tr>
<tr>
<td>Press #5</td>
<td>OXD#7</td>
<td>June 2, 2020</td>
<td></td>
<td></td>
<td>326 IAC 2-2 326 IAC 8-5-5 326 IAC 8-1-12</td>
</tr>
<tr>
<td>Press #6</td>
<td>OXD#6</td>
<td>June 3, 2020</td>
<td></td>
<td></td>
<td>326 IAC 2-2 326 IAC 8-5-5 326 IAC 8-1-12</td>
</tr>
</tbody>
</table>
(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thermal Oxidizers OXD#6, OXD#7, and OXD#8</td>
<td>3-hr average combustion zone temperature</td>
<td>continuous</td>
</tr>
<tr>
<td>Thermal Oxidizers OXD#6, OXD#7, and OXD#8</td>
<td>Duct Pressure or fan amperage</td>
<td>daily</td>
</tr>
<tr>
<td>Catalytic Oxidizer OXD#2 and OXD#5</td>
<td>3-hr average catalyst bed inlet and outlet temperatures</td>
<td>continuous</td>
</tr>
<tr>
<td>Catalytic Oxidizer OXD#2 and OXD#5</td>
<td>Duct Pressure or fan amperage</td>
<td>daily</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the OXD#2/OXD#8, OXD#5, OXD#6, and OXD#7 for the Press Lines and Parts Washers must operate properly to assure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-7 (Part 70 Permits), and 40 CFR 64 (CAM).

**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 were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

1. IDEM OAQ, added the new Press Line and Parts Washer to Section A, D.1., D.2, and E.2.
2. IDEM OAQ, removed units from Section A and D.2.
3. IDEM OAQ, edited the emission unit descriptions to make each process more clear.
4. IDEM OAQ, added Press #7’s testing requirements and updated the testing requirement language in Section D.1.8.
5. IDEM OAQ, added the new units to the Quarterly Reporting Forms.
6. The Permittee uses control devices to comply with 326 IAC 8-5-5. Therefore the requirements for complying with 326 IAC 8-5-5 without using a control device have been removed from the permit (former section D.1).
A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/ hr, exhausting through one (1) stack identified as SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, (5.8 MMBtu/hr) exhausting through one (1) stack identified as S-OXD5, or controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stack identified as S-OXD7; or controlled by one (1) oxidizer, identified as OXD#5 and one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stacks identified as S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, constructed in 2013, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either one (1) natural gas fired regenerative thermal oxidizer identified as OXD#6, with a maximum design capacity of 9 MMBtu/hr, exhausting through one (1) stack identified as S-OXD6 or are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, exhausting through one (1) stack identified as S-OXD7.
Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected maximum solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

(f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, constructed in 2010, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, and:

(1) modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(2) modified in 2016 to increase the projected maximum solvent consumption rate to sixty-seven (67) gallons per day.

(i) One (1) mechanical spray cold cleaner degreaser, identified as PW6, constructed in 2015, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through
one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(j) One (1) manual cold cleaner degreaser, identified as PW7, constructed in 2016, with a projected maximum solvent consumption rate of twenty-four (24) gallons per day, directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(k) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(l) One (1) catalytic oxidizer, identified as OXD#5, with a maximum design capacity of 5.8 MMBtu/hr, exhausting through stack S-OXD5.

(m) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through stack S-OXD6.

(n) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(o) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

(p) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

A.3 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, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through one (1) stack identified as S005.

(e) One (1) seaming machine, identified as Seam Mach 1, with a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 400-500 meters per minute (mpm).

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

This section applies when not using oxidizers for compliance.

Emissions Unit Description:

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when
printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through one (1) stack identified as SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press # 4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5 (5.8 MMBtu/hr) exhausting through one (1) stack identified as S-OXD5, or controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stack identified as S-OXD7; or controlled by one (1) oxidizer, identified as OXD#5 and one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stacks identified as S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press # 5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, constructed in 2013, exhausting through one (1) stack identified as S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either one (1) natural gas fired regenerative thermal oxidizer identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through one (1) stack identified as S-OXD6 or are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, exhausting through one (1) stack identified as S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved for construction in 2021, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by one (1) natural gas fired
Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.1.2 Graphic Arts Operations [326 IAC 8-5-5(f)]

Pursuant to 326 IAC 8-5-5(f), work practices for Presses #1, #4, #5, #6, and #7 shall include, but not be limited to, the following:

(a) When not in use, all cleaning materials shall be kept in closed containers.

(b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.1.3 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 total input of VOC, including inks, adhesives, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (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.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B- Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.5 Volatile Organic Compounds (VOC) Control

In order to assure compliance with Condition D.1.3, the catalytic oxidizer OXD#5 and thermal oxidizers OXD#6 and OXD#7 shall be in operation and control emissions from the associated presses at all times the associated presses are in operation.

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

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.1.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#5, controlling Press #4, not later than two and one-half (2.5) years from the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#6 (controlling Press #1, Press #6, and Press #7) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(c) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#7 (controlling Press #4, Press #5, and Press #6) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(d) In order to demonstrate compliance with Condition D.1.3, not later than 180 days after startup of Press #7, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#6 (controlling Press #1, Press #6, and Press #7). The test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

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

D.1.8 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#6 and OXD#7 for measuring operating temperature. For the purpose of this condition,
continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Condition D.1.3.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test.

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

D.1.9 Thermal Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.1.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers, identified as OXD#6 and OXD#7, are in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack tests.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.10 Catalytic Incinerator Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#5 for measuring catalyst bed inlet and outlet temperatures. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the latest valid stack test that demonstrates compliance with limits in Condition D.1.3.

(c) On and after the date the stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the 3-hour average catalyst bed inlet and outlet temperatures as observed during the latest compliant stack test.

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

D.1.11 Catalytic Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.1.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer, identified as OXD#5, is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack tests.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

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

D.1.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

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

D.1.13 Record Keeping Requirements [326 IAC 8-1-10]

(a) To document the compliance status with Condition D.1.1, pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
Section C – General Record Keeping Requirements, of this permit contains the Permittee’s obligations with regard to the records required by this condition.

D.1.14 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.3.

Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.

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

(2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.

(3) A log of the dates of use.

(4) The total VOC usage for each month at each press.

(5) The weight of VOCs emitted for each compliance period for each press.

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain continuous temperature records for each of the regenerative thermal oxidizers (RTO) (OXD#6 and OXD#7) (on a 3-hour average basis) used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the RTO was not in operation).

(c) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizers (OXD#6 and OXD#7). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g., the process did not operate that day).

(d) To document the compliance status with Condition D.1.10, the Permittee shall maintain continuous temperature records for the catalytic oxidizer (OXD#5) (on a 3-hour average basis) used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the catalytic oxidizer was not in operation).

(e) To document the compliance status with Condition D.1.11, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (OXD#5). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g., the process did not operate that day).

(f) Section C – General Record Keeping Requirements, of this permit contains the Permittee’s obligations with regard to the records required by this condition.

D.1.15 Reporting Requirements [326 IAC 8-1-10]

(a) In order to demonstrate the compliance status with Condition D.1.1, pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;  
(B) Time, date, and duration of the noncompliance; and  
(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;  
(2) The name, address, and telephone number of the person responsible for the source;  
(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;  
(4) The name and identification number of each coating, as applied, used at each coating facility; and  
(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.1.16 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations 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).

***

SECTION D.12 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer,
identified as OXD#6, with a maximum design capacity of 9 MMBtu/hr, exhausting through one (1) stack identified as SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, (5.8 MMBtu/hr) exhausting through one (1) stack identified as S-OXD5, or controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stack identified as S-OXD7; or controlled by one (1) oxidizer, identified as OXD#5 and one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stacks identified as S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, constructed in 2013, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either one (1) natural gas fired regenerative thermal oxidizer identified as OXD#6, with a maximum design capacity of 9 MMBtu/hr, exhausting through one (1) stack identified as S-OXD6 or are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, exhausting through one (1) stack identified as S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.
(l) One (1) catalytic oxidizer, identified as OXD#5, with a maximum design capacity of 5.8 MMBtu/hr, exhausting through stack S-OXD5.

(m) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 12.21 MMBtu/hr, exhausting through stack SOXD6.

(n) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(o) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

(p) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

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

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

D.21.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) Reserved.

(12) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.

(23) The natural gas fired regenerative thermal oxidizer identified as OXD#6 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.

(34) The natural gas fired regenerative thermal oxidizer identified as OXD#7 shall maintain a minimum operating temperature of 1500°F or at least a temperature determined in the most recent compliance test to maintain a minimum 90% destruction of the nonmethane VOC captured.
D.21.2 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5(f), work practices for Presses #1, #4, #5, and #6, and #7 shall include, but not be limited to, the following:

(a) When not in use, all cleaning materials shall be kept in closed containers.

(b) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.12.3 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 total input of VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, and #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, and P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (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.12.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

***

D.12.5 Volatile Organic Compounds (VOC) Control

In order to assure compliance with Conditions D.21.1 and D.21.3, the catalytic oxidizer OXD#5 and thermal oxidizers OXD#6 and OXD#7 shall be in operation and control emissions from the associated presses at all times the associated presses are in operation.

***

D.12.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.12.1 and D.12.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

***

D.12.7 Testing Requirements [326 IAC 8-1-12]

***

D.12.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 8-1-12]

(a) In order to demonstrate compliance with Condition D.12.3, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#5, controlling Press #4, not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.
(b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#6 (controlling Press #1, Press #6, and Press #7) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

In order to demonstrate compliance with Condition D.2.3, not later than 180 days after startup of Press #6, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#6 (controlling Press #1 and Press #6). The test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(c) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing of the OXD#7 (controlling Press #4, Press #5, and Press #6) utilizing methods as approved by the Commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

In order to demonstrate compliance with Condition D.2.3, not later than 180 days after startup of Press #6, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7 (controlling Press #4, Press #5, and Press #6). The test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(d) In order to demonstrate compliance with Condition D.1.3, not later than 180 days after startup of Press #7, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#6 (controlling Press #1, Press #6, and Press #7) and OXD#8. The test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent compliance demonstration.

(e) Not later than 180 days after the startup of OXD#8 the Permittee shall perform VOC testing of the OXD#8 utilizing methods approved by the commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

(f) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

D.12.9 Thermal Oxidizer Temperature [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#6, OXD#7, and OXD#8 for measuring combustion zone temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of startup of OXD#8 until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour average temperatures from the latest valid stack test that demonstrates compliance with limits in Conditions D.12.1 and D.12.3.
D.12.10 Thermal Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.12.1 and D.12.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers, identified as OXD#6, and/or OXD#7, and/or OXD#8, are in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack tests.

D.12.11 Catalytic Incinerator Temperature [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#2 and OXD#5 for measuring catalyst bed inlet and outlet temperatures. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the latest valid stack test that demonstrates compliance with limits in Conditions D.12.1 and D.12.3.

D.12.12 Catalytic Oxidizer Duct Pressure or Fan Amperage [40 CFR 64]

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.12.1 and D.12.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizers, identified as OXD#5 and OXD#2, are in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.

D.12.13 Monitoring Requirements [326 IAC 8-1-12]

D.12.14 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

D.12.15 Record Keeping Requirements [326 IAC 8-1-12]

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.12.9 pursuant to 326 IAC 8-1-12(b)(1)(C).

D.12.16 Record Keeping Requirements

(a) To document the compliance status with Condition D.12.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.12.3. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.

(b) To document the compliance status with Condition D.12.10, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizers (OXD#6 and OXD#7, and OXD#8). The Permittee shall include in its daily record when
the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.12.12, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (OXD#5). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

***

D.12.17 Reporting Requirements [326 IAC 8-1-12]

D.12.18 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.12.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations 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).

***

SECTION D.23 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) mechanical spray cold cleaner degreaser, identified as PW2, constructed in April of 2001, with a projected maximum solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7.

(f) One (1) mechanical spray cold cleaner degreaser, identified as PW3, constructed in 2010, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing a closed-loop solvent recycling and distillation system, modified in 2014 to have the option to direct emissions through either one (1) catalytic oxidizing incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(g) One (1) mechanical spray cold cleaner degreaser, identified as PW4, constructed in 2013, with a projected maximum solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation system. PW4 was modified in 2014 to have the option of directing the volatile organic compound (VOC) and hazardous air pollutants (HAP) emissions from PW4 to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(h) One (1) manual cold cleaner degreaser, identified as PW5, constructed in 2013, and:
(1) modified in 2014 to have the option of directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(2) modified in 2016 to increase the projected maximum solvent consumption rate to sixty-seven (67) gallons per day.

(i) One (1) mechanical spray cold cleaner degreaser, identified as PW6, constructed in 2015, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(j) One (1) manual cold cleaner degreaser, identified as PW7, constructed in 2016, with a projected maximum solvent consumption rate of twenty-four (24) gallons per day, directing emissions to either one (1) catalytic oxidizer incinerator, identified as OXD#2 (4.0 MMBtu/hr), exhausting through one (1) stack identified as S-OXD2 or one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(k) One (1) mechanical spray cold cleaner degreaser, identified as PW8, approved for construction in 2021, with a projected solvent consumption rate of twelve (12) gallons per day, utilizing closed-loop solvent recycling and distillation, directing emissions through either OXD#2, exhausting through stack S-OXD2 or by OXD#7, exhausting through stack S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

(n) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#7, with a maximum design capacity of 14.50 MMBtu/hr then exhausted through stack S-OXD7.

(o) One (1) natural gas fired regenerative thermal oxidizer, identified as OXD#8, with a maximum design capacity of 8.00 MMBtu/hr, exhausting through stack S-OXD8.

(p) One (1) catalytic oxidizer incinerator, identified as OXD#2, with a maximum design capacity of 4.00 MMBtu/hr, exhausting through stack S-OXD2.

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

D.23.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.23.2 PSD Minor Limit [326 IAC 2-2]

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

(a) The total VOC usage at PW3 through PW8 shall be limited to 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The minimum overall VOC control efficiency shall be 94.20%.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (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.23.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

***

D.23.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

***

D.23.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.32.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the solvent manufacturer.

D.23.6 Volatile Organic Compounds (VOC) Control

(a) In order to assure compliance with Condition D.23.2, the catalytic oxidizer OXD#2 or OXD#8 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#2 or OXD#8.

(b) In order to assure compliance with Condition D.23.2, the thermal oxidizer OXD#7 shall be in operation and control emissions from the part washers at all times when the part washers are in operation and directing emissions through OXD#7.

D.23.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.23.2, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#2 not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Condition D.23.2, the Permittee shall conduct VOC control efficiency (as the product of destruction efficiency and capture efficiency) testing on OXD#7 not later than 2.5 years from the most recent valid compliance demonstration, using methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

(c) Not later than 180 days after the startup of OXD#8 the Permittee shall perform VOC testing of the OXD#8 utilizing methods approved by the commissioner at least once every 2.5 years from the date of the most recent valid compliance demonstration.

(d) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the
Permittee's obligation with regard to the performance testing required by this condition.

D.32.8 Catalytic Incinerator Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#2 and OXD#8 for measuring catalyst bed inlet and outlet temperatures. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of startup of OXD#8 until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour average catalyst bed inlet and outlet temperatures from the latest valid stack test that demonstrates compliance with limits in Condition D.32.2.

D.32.9 Catalytic Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.32.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer, identified as OXD#2, is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.

D.32.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on OXD#7 or OXD#8 for measuring combustion zone temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of the temperature monitoring system shall be recorded as a 3-hour average.

(b) The Permittee shall determine the 3-hour average temperatures from the latest valid stack test that demonstrates compliance with limits in Condition D.32.2.

D.32.11 Thermal Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.32.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer, identified as OXD#7 or OXD#8, is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack tests.

D.32.12 Record Keeping Requirements

(a) To document the compliance status with Condition D.32.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.32.2.

(1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use.
(3) The cleanup solvent usage for each month.

(4) The total VOC usage in parts washer PW3 PW2 through PW8 PW7 for each month.

(b) To document the compliance status with Condition D.23.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(c) To document the compliance status with Condition D.32.9, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (OXD#2). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(d) To document the compliance status with Condition D.32.11, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers (OXD#7 and OXD#8). The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

D.23.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.32.2 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations 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).

SECTION D.34 EMISSIONS UNIT OPERATION CONDITIONS

D.34.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

D.34.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

SECTION E.12 NSPS

Emissions Unit Description:

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through one (1) stack identified as S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

(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 Dc.
(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.2.1.2 Small Industrial-Commercial Institutional Steam Generating Units NSPS [326 IAC 12]** [40 CFR Part 60, Subpart Dc]

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

1. 40 CFR 60.40c(a), (b), (c), and (d);
2. 40 CFR 60.41c;
3. 40 CFR 60.48c(a), (a)(1), (a)(3), (g), and (i).

***

**SECTION E.1 NSPS**

**Emissions Unit Description:**

(a) One (1) natural gas fired hot oil boiler identified as TH2 used to heat Press #5, Press #6, and Press #7 constructed in 2013, rated at 10 MMBtu/hr and exhausting through one (1) stack identified as S005.

Under 40 CFR 60, Subpart Dc, TH2 is an affected unit.

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

***

**SECTION E.2 NESHAP**

**Emissions Unit Description:**

(a) One (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired pressure dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P1U1-P1U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer, identified as OXD#6, with a maximum design capacity of 9 MMBtu/hr, exhausting through one (1)-stack identified as SOXD6.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #1 (ten stations: P1U1 through P1U10) are considered an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as Press #4, (ten stations: P4U1 through P4U10), constructed in January of 2004, with a maximum line speed of
800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U1-P4U10 are controlled by one (1) catalytic oxidizer, identified as OXD#5, (5.8 MMBtu/hr) exhausting through one (1) stack identified as S-OXD5, or controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stack identified as S-OXD7; or controlled by one (1) oxidizer, identified as OXD#5 and one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, then exhausted through stacks identified as S-OXD5 and S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #4, (ten stations: P4U1 through P4U10) are considered a new affected source; and

(c) One (1) ten (10) station packaging rotogravure printing press identified as Press #5 (ten stations: P5U1 through P5U10), constructed in 2013, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P5U1-P5U10 are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, constructed in 2013, exhausting through one (1) stack identified as S-OXD7 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #5 (ten stations: P5U1 through P5U10) are considered a new affected source.

(d) One (1) eleven (11) station packaging rotogravure printing press identified as Press #6 (eleven stations: P6U1 through P6U11), constructed in 2019, with a maximum line speed of 1600 ft/min when printing with ink and 1066 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P6U1-P6U11 are controlled by either one (1) natural gas fired regenerative thermal oxidizer identified as OXD#6, with a maximum design capacity of 9 MMBtu/hr, exhausting through one (1) stack identified as S-OXD6 or are controlled by one (1) natural gas fired regenerative thermal oxidizer identified as OXD#7, with a maximum design capacity of 14.5 MMBtu/hr, exhausting through one (1) stack identified as S-OXD7.

Under NESHAP Subpart KK the packaging rotogravure printing operations at Press #6 (eleven stations: P6U1 through P6U11) are considered a new affected source.

(e) One (1) ten (10) station Central Impression (CI) flexographic press identified as Press #7 (ten stations: P7U1 through P7U10), with one (1) gravure unit, identified as P7U11, approved in 2021 for construction, with a maximum line speed of 1640 ft/min when printing with ink. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P7U1-P7U10 are controlled by OXD#6, exhausting through stack S-OXD6 or by OXD#8, exhausting through stack S-OXD8.

Under NESHAP Subpart KK the CI and gravure printing operations at Press #7 (ten stations: P7U1 through P7U10, and one gravure unit, P7U11) are considered an affected source.

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

(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 KK.

(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.42.2 Printing and Publishing Industry NESHAP [40 CFR Part 63, Subpart KK] [326 IAC 20-18]

***

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

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007
Facility: Presses #1, #4, #5, #6 and #7 emission units P1U1-10, P4U1-10, P5U1-10, P6U1-U11, and P7U1-11
Parameter: VOC Usage
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1, #4, #5, #6, and #7 (emission units P1U1 through P1U10, P4U1 through P4U10, P5U1 through P5U10, P6U1 through P6U11, and P7U1 through P7U11) shall be limited to 3,292 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>VOC</td>
<td>VOC</td>
<td>VOC</td>
</tr>
<tr>
<td></td>
<td>Press Lines #1, #4, #5, #6, and #7</td>
<td>Press Lines #1, #4, #5, #6, and #7</td>
<td>Press Lines #1, #4, #5, #6, and #7</td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</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 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, Indiana 47170
Part 70 Permit No.: T143-43290-00007
Facility: Parts Washers PW2 through PW7

Parameter: VOC Usage
Limit: The total VOC usage at PW3 through PW8 shall be limited to 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Column 1</td>
<td>Column 2</td>
</tr>
<tr>
<td>Month</td>
<td></td>
</tr>
<tr>
<td>VOC PW3, PW4, PW5, PW6, PW7, and PW8</td>
<td>VOC PW3, PW4, PW5, PW6, PW7, and PW8</td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
</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: ___________________________________________________________

## 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 September 21, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 143-43360-00007.

The operation of this stationary packaging rotogravure printing operation shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. 143-43290-00007.

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

## IDEM Contact

(a) If you have any questions regarding this permit, please contact Shelby O'Neal, 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) 233-8578 or (800) 451-6027, and ask for Shelby O'Neal or (317) 233-8578.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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](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](http://www.in.gov/idem/6900.htm).
**Summary Sheet - Uncontrolled and Limited Emissions Summary**

**Source Name:** Multi-Color Corporation  
**Address City IN Zip:** 2281 South U.S. 31, Scottsburg, Indiana 47170  
**Renewal:** 143-43290-00007  
**SSM Permit No.** 143-43360-00007  
**Permit Reviewer:** Shelby O’Neal

### Emission Units

<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>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Combustion</td>
<td>0.59</td>
<td>2.34</td>
<td>2.34</td>
<td>0.18</td>
<td>30.80</td>
<td>1.69</td>
<td>25.67</td>
<td>0.58</td>
</tr>
<tr>
<td><strong>Presses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #1 and Press #4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>8,076.48</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Press #5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>6,091.36</td>
<td>0</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Press #6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>10,773.62</td>
<td>0</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Press #7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>17,417.92</td>
<td>0</td>
<td>&gt;25</td>
</tr>
<tr>
<td><strong>Degreasing</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PW3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>16.83</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>16.83</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>96.35</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>16.83</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>34.51</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW8</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>16.83</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Insignificant Activities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isopropyl acetate Storage Tanks</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1.00</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ink dispensing system</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2.00</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Degreasing Operation</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.86</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Seaming Machines</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>0.59</td>
<td>2.34</td>
<td>2.34</td>
<td>0.18</td>
<td>30.80</td>
<td>42,575.68</td>
<td>25.87</td>
<td>&gt;25</td>
</tr>
</tbody>
</table>

**Title V Major Source Thresholds**

- N/A 100 100 100 100 100 100 25

**PSD Major Source Thresholds**

- 250 250 250 250 250 250 250 N/A

### Limited Potential to Emit (PTE) - Potential To Emit of the Entire Source After Issuance of Permit (tons/year)

<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>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Combustion</td>
<td>0.59</td>
<td>2.34</td>
<td>2.34</td>
<td>0.18</td>
<td>30.80</td>
<td>1.69</td>
<td>25.67</td>
<td>0.58</td>
</tr>
<tr>
<td><strong>Press VOC Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #1 and Press #4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>190.94</td>
<td>0</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Press #5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>13.75</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Press #6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Degreasing</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PW3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>13.75</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>PW4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PW5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PW6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PW7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PW8</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Insignificant Activities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isopropyl acetate Storage Tanks</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1.00</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ink dispensing system</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2.00</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Degreasing Operation</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.86</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Seaming Machines</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12.55</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>0.59</td>
<td>2.34</td>
<td>2.34</td>
<td>0.18</td>
<td>30.80</td>
<td>222.79</td>
<td>25.87</td>
<td>&gt;25</td>
</tr>
</tbody>
</table>

**Title V Major Source Thresholds**

- N/A 100 100 100 100 100 100 25

**PSD Major Source Thresholds**

- 250 250 250 250 250 250 250 N/A

**Limits**

- The Presses #1, #4, #5, #6, and #7 are limited in order for the source to remain a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- The emission units PW3 through PW8 are limited for the source to remain a minor source under 326 IAC 2-2 to 237 tons per year VOC usage and minimum control efficiency of 94.2%.
- Tank emissions and ink dispensing system emissions conservatively assumed to be 1.00 and 2.00 tons of VOC per year.
## TSD Appendix A: Emissions Calculations

### Modification Summary

**Source Name:** Multi-Color Corporation  
**Address City IN Zip:** 2281 South U.S. 31, Scottsburg, Indiana 47170  
**Renewal:** 143-43290-00007  
**SSM Permit No.:** 143-43360-00007  
**Permit Reviewer:** Shelby O'Neal

### Uncontrolled Potential to Emit of New Units (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>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>17,417.92</td>
<td>0</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Parts Washer #8</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>16.83</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>OXD#8</td>
<td>0.07</td>
<td>0.26</td>
<td>0.26</td>
<td>0.02</td>
<td>3.44</td>
<td>0.19</td>
<td>2.89</td>
<td>0.06</td>
</tr>
<tr>
<td><strong>Total of New Units</strong></td>
<td><strong>0.07</strong></td>
<td><strong>0.26</strong></td>
<td><strong>0.26</strong></td>
<td><strong>0.02</strong></td>
<td><strong>3.44</strong></td>
<td><strong>17,434.95</strong></td>
<td><strong>2.89</strong></td>
<td><strong>&gt;25</strong></td>
</tr>
</tbody>
</table>
### Emissions Calculations

#### Natural Gas Combustion Only

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Multi-Color Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address City</td>
<td>Scottsburg, Indiana 47170</td>
</tr>
<tr>
<td>SSM Permit No.</td>
<td>143-43360-00007</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Shelby O'Neal</td>
</tr>
</tbody>
</table>

#### Emission Factor in MMCF

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>HAPs - Organics EF (lb/MMCF)</th>
<th>HAPs - Metals EF (lb/MMCF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catalytic Oxidizer OXD#2</td>
<td>3.1E-03, 2.1E-03, 7.5E-02, 1.8E+00, 3.4E-03</td>
<td>5.0E-04, 1.1E-03, 1.4E-03, 3.8E-04, 2.1E-03, 4.1E-04</td>
</tr>
<tr>
<td>Regenerative Thermal Oxidizer OXD#6</td>
<td>1.1E-04, 6.3E-05, 3.9E-03, 9.4E-02, 1.8E-04</td>
<td>9.0E-05, 5.2E-05, 3.2E-03, 7.7E-02, 1.5E-04</td>
</tr>
<tr>
<td>NEW Regenerative Thermal Oxidizer OXD#8</td>
<td>1.1E-04, 5.0E-05, 2.6E-03, 7.7E-02, 1.8E-04</td>
<td>2.1E-05, 4.7E-05, 8.9E-05, 2.3E-04</td>
</tr>
<tr>
<td>Press #1 Drying System</td>
<td>5.0E-05, 2.5E-05, 1.3E-03, 3.1E-02, 7.0E-04</td>
<td>1.1E-05, 2.4E-05, 3.0E-05, 8.2E-06, 4.5E-05</td>
</tr>
<tr>
<td>Press #4 Drying System</td>
<td>1.1E-05, 5.5E-06, 2.8E-04, 7.2E-03, 1.7E-05</td>
<td>2.6E-05, 5.8E-05, 7.3E-05, 2.0E-05, 1.1E-04</td>
</tr>
<tr>
<td>Press #5, #6, and #7 Boiler (TH2)</td>
<td>1.1E-05, 5.5E-06, 2.8E-04, 7.2E-03, 1.7E-05</td>
<td>2.6E-05, 5.8E-05, 7.3E-05, 2.0E-05, 1.1E-04</td>
</tr>
<tr>
<td><strong>Total HAPs</strong></td>
<td>0.98</td>
<td><strong>Worst HAP</strong></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.
### Throughput for Printing Offset Presses

<table>
<thead>
<tr>
<th>Press #</th>
<th>Maximum Line Speed (ft/min)</th>
<th>Convert Feet to Inches</th>
<th>Maximum Print Width (in)</th>
<th>Hours</th>
<th>Days</th>
<th>8,760 Hrs</th>
<th>11,000,000</th>
<th>Potential MBM²/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #1</td>
<td>740</td>
<td>222</td>
<td>20.9</td>
<td>87.6</td>
<td>29.1</td>
<td>9,768</td>
<td>17,950</td>
<td>383,000</td>
</tr>
<tr>
<td>Press #4</td>
<td>800</td>
<td>222</td>
<td>20.9</td>
<td>87.6</td>
<td>29.1</td>
<td>9,768</td>
<td>17,950</td>
<td>419,600</td>
</tr>
</tbody>
</table>

### Throughput for Packaging Rotogravure Printing Presses

<table>
<thead>
<tr>
<th>Press #</th>
<th>Press I.D.</th>
<th>Maximum Line Speed (ft/min)</th>
<th>Convert Feet to Inches</th>
<th>Maximum Print Width (in)</th>
<th>Hours</th>
<th>Days</th>
<th>8,760 Hrs</th>
<th>1,000,000</th>
<th>Potential MMin²/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #1</td>
<td>Press #1</td>
<td>740</td>
<td>222</td>
<td>20.9</td>
<td>87.6</td>
<td>29.1</td>
<td>9,768</td>
<td>183,893</td>
<td></td>
</tr>
<tr>
<td>Press #4</td>
<td>Press #4</td>
<td>800</td>
<td>222</td>
<td>20.9</td>
<td>87.6</td>
<td>29.1</td>
<td>9,768</td>
<td>201,830</td>
<td></td>
</tr>
</tbody>
</table>

### Potential Uncontrolled VOC Emissions

<table>
<thead>
<tr>
<th>Ink Name</th>
<th>Potential VOC Pounds per Hour</th>
<th>Potential VOC Tons per Year</th>
<th>Control Equipment ID</th>
<th>Overall Control Efficiency</th>
<th>Controlled VOC Pounds per Hour</th>
<th>Controlled VOC Tons per Year</th>
<th>VOC Input Limitation% of potential input</th>
<th>Limited/Controlled VOC Tons per Year</th>
<th>Total Limited VOC Emissions Tons per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>OXD#6</td>
<td>94.20%</td>
<td>10.24</td>
<td>44.87</td>
<td>15.42%</td>
<td>6.92</td>
<td>119.29</td>
</tr>
<tr>
<td>Press #1 - Adcote Adhesive</td>
<td>176.62</td>
<td>773.61</td>
<td>OXD#6</td>
<td>94.20%</td>
<td>10.24</td>
<td>44.87</td>
<td>15.42%</td>
<td>6.92</td>
<td>119.29</td>
</tr>
<tr>
<td>Press #1 - Minute Maid Yellow Ink</td>
<td>134.40</td>
<td>588.66</td>
<td>OXD#6</td>
<td>94.20%</td>
<td>7.80</td>
<td>34.14</td>
<td>15.42%</td>
<td>5.26</td>
<td>90.77</td>
</tr>
<tr>
<td>Press #1 - TF IML 2D Topcoat Varnish</td>
<td>120.16</td>
<td>526.29</td>
<td>OXD#6</td>
<td>94.20%</td>
<td>6.97</td>
<td>30.52</td>
<td>15.42%</td>
<td>4.71</td>
<td>81.15</td>
</tr>
<tr>
<td>Press #4 - Adhesive</td>
<td>443.39</td>
<td>1942.05</td>
<td>OXD#5</td>
<td>94.20%</td>
<td>25.72</td>
<td>112.64</td>
<td>15.42%</td>
<td>17.37</td>
<td>299.46</td>
</tr>
<tr>
<td>Press #4 - Ink/Varnish</td>
<td>969.38</td>
<td>4245.87</td>
<td>OXD#5</td>
<td>94.20%</td>
<td>56.22</td>
<td>246.26</td>
<td>15.42%</td>
<td>37.97</td>
<td>654.71</td>
</tr>
<tr>
<td>Total Potential Uncontrolled Emissions</td>
<td>1,843.94</td>
<td>8,076.48</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,245.90</td>
</tr>
</tbody>
</table>

### Note:
- The coatings within one category (adhesive, ink, or varnish) are mutually exclusive with the other coatings within that category (adhesive, ink or varnish).
- Press #1 has a maximum line speed of 840 ft/min (printing only) or 740 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 740 ft/min of printing and adhesive.
- Press #4 has a maximum line speed of 800 ft/min (printing and adhesive). Emission calculations are based on the worst case scenario of 800 ft/min of printing and adhesive.
- Heatset offset printing has an assumed flash off of 85%. Other types of printers have a flash off of 100%.
- There are negligible emissions from clean-up operations.

### Methodology:
- Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year
- VOC = Maximum Coverage pounds per MBM² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
- Controlled/Limited Emissions = Uncontrolled Emissions * (1 - Overall Control Efficiency) * VOC Input Limitation%
## TSD Appendix A: Emissions Calculations

### Press #5

**Source Name:** Multi-Color Corporation  
**Address City In Zip:** 2281 South U.S. 31, Scottsburg, Indiana 47170  
**Renewal:** 143-43290-00007  
**SSM Permit No.:** 143-43360-00007  
**Permit Reviewer:** Shelby O'Neal

### Press I.D.

**Max Line Speed (ft/min):** 1,068  
**Convert Feet to Inches:** 12  
**Maximum Print Width (in):** 31.7  
**60 Min / Hour:** 60  
**8,760 Hr / Year:** 8,760  
**5,000,000:** 5,000,000  
**Potential MMin²/Year:** 213,134

### Press #5: Coca-Cola Labels

<table>
<thead>
<tr>
<th>Unit No.</th>
<th>Ink Name</th>
<th>VOC</th>
<th>Ink Weight %</th>
<th>Water</th>
<th>As Applied</th>
<th>As-Applied</th>
<th>As-Applied</th>
<th>Maximum Coating Coverage lbs/MMin²</th>
<th>Flash Off %</th>
<th>Potential Throughput MMin²/Year</th>
<th>Potential VOC Pounds per Ton per Year</th>
<th>Potential VOC Emissions Tons per Year</th>
<th>Overall Control Efficiency</th>
<th>Controlled VOC Pounds per Hour</th>
<th>Controlled VOC Tons per Year</th>
<th>VOC Input Limitation as a % of Potential Tons per Year</th>
<th>Controlled VOC Tons per Year</th>
<th>Total Limited VOC Tons per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Varnish</td>
<td>2.08</td>
<td>100.00%</td>
<td>75.42</td>
<td>0.00%</td>
<td>30.00%</td>
<td>82.79%</td>
<td>827900%</td>
<td>0.00%</td>
<td>17.21%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>14.12</td>
<td>61.86</td>
<td>15.42%</td>
<td>9.54</td>
<td>164.47</td>
</tr>
<tr>
<td>2</td>
<td>Black</td>
<td>0.58</td>
<td>100.00%</td>
<td>73.82</td>
<td>0.00%</td>
<td>30.00%</td>
<td>81.67%</td>
<td>816700%</td>
<td>0.00%</td>
<td>18.33%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>3.65</td>
<td>15.98</td>
<td>15.42%</td>
<td>2.46</td>
<td>42.48</td>
</tr>
<tr>
<td>3</td>
<td>360 Red</td>
<td>3.47</td>
<td>100.00%</td>
<td>70.00</td>
<td>0.00%</td>
<td>30.00%</td>
<td>79.00%</td>
<td>790000%</td>
<td>0.00%</td>
<td>21.00%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>18.43</td>
<td>80.68</td>
<td>15.42%</td>
<td>12.44</td>
<td>214.51</td>
</tr>
<tr>
<td>4</td>
<td>White</td>
<td>4.05</td>
<td>100.00%</td>
<td>56.28</td>
<td>0.00%</td>
<td>30.00%</td>
<td>69.40%</td>
<td>694000%</td>
<td>0.00%</td>
<td>30.60%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>12.96</td>
<td>56.76</td>
<td>15.42%</td>
<td>8.75</td>
<td>150.91</td>
</tr>
<tr>
<td>5</td>
<td>360 Red</td>
<td>3.47</td>
<td>100.00%</td>
<td>70.00</td>
<td>0.00%</td>
<td>30.00%</td>
<td>79.00%</td>
<td>790000%</td>
<td>0.00%</td>
<td>21.00%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>18.43</td>
<td>80.68</td>
<td>15.42%</td>
<td>12.44</td>
<td>214.51</td>
</tr>
<tr>
<td>6</td>
<td>Adhesive</td>
<td>2.55</td>
<td>100.00%</td>
<td>76.79</td>
<td>0.00%</td>
<td>30.00%</td>
<td>83.79%</td>
<td>837900%</td>
<td>0.00%</td>
<td>16.25%</td>
<td>213.134</td>
<td>2,000</td>
<td>94.20%</td>
<td>18.55</td>
<td>81.25</td>
<td>15.42%</td>
<td>12.53</td>
<td>216.01</td>
</tr>
</tbody>
</table>

### Total Potential Emissions: Coca-Cola Labels

| 1,390.72 | 6,091.36 | 80.86 | 353.30 | 54.48 | 939.29 |

### Notes:

- All calculations based upon highest VOC content labels printed at facility.
- Maximum speed for applying designated adhesive used for each press.
- Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%.
- There are negligible emissions from clean-up operations.

### Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatile minus water) * Flash-off / Throughput * Tons per 2,000 pounds = Tons per Year

Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Overall Control Efficiency)) * VOC Input Limitation (%)
TSD Appendix A: Emissions Calculations

Press #6

Source Name: Multi-Color Corporation
Address City In Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Renewal: 143-43290-00007
SSM Permit No.: 143-43360-00007
Permit Reviewer: Shelby O'Neal

Press #6 Throughput for Packaging Rotogravure Printing Press

<table>
<thead>
<tr>
<th>Press I.D.</th>
<th>Maximum Print Width (in)</th>
<th>8,760 Hr Year</th>
<th>1,000,000 MMin²/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press #6</td>
<td>1,655</td>
<td>31.7</td>
<td>60</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8,760</td>
<td>319,901</td>
</tr>
</tbody>
</table>

Pressing VOC:

<table>
<thead>
<tr>
<th>Unit No.</th>
<th>Ink Name</th>
<th>Maximum Solids Coverage lbs/MM²</th>
<th>Thinner Weight %</th>
<th>Ink Weight %</th>
<th>Blank Weight %</th>
<th>As-Applied Weight %</th>
<th>As-Applied Weight %</th>
<th>As-Applied Weight %</th>
<th>Maximum Coating Coverage lbs/MM²</th>
<th>Maximum Solids Coverage lbs/MM²</th>
<th>Flash Off %</th>
<th>Potential Throughput MMin²/Year</th>
<th>Potential VOC Emissions Pounds per Year</th>
<th>Control Equipment ID Efficiency Pounds per Hour</th>
<th>Tons per Year</th>
<th>% of potential input</th>
<th>Tons per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Varnish</td>
<td>2.08</td>
<td>100.00%</td>
<td>75.42%</td>
<td>20.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>82.70%</td>
<td>75.42%</td>
<td>12.09</td>
<td>319,901</td>
<td>2,000</td>
<td>388.91</td>
<td>1609.91</td>
<td>94.20%</td>
<td>21.20%</td>
</tr>
<tr>
<td>2</td>
<td>Various colors</td>
<td>0.58</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>36.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>3</td>
<td>Various colors</td>
<td>0.47</td>
<td>100.00%</td>
<td>70.00%</td>
<td>30.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>79.00%</td>
<td>70.00%</td>
<td>21.00%</td>
<td>319,901</td>
<td>2,000</td>
<td>47.80</td>
<td>197.80</td>
<td>94.20%</td>
<td>27.65%</td>
</tr>
<tr>
<td>4</td>
<td>Various colors</td>
<td>0.98</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>94.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>5</td>
<td>Various colors</td>
<td>0.58</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>94.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>6</td>
<td>Various colors</td>
<td>0.47</td>
<td>100.00%</td>
<td>70.00%</td>
<td>30.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>79.00%</td>
<td>70.00%</td>
<td>21.00%</td>
<td>319,901</td>
<td>2,000</td>
<td>47.80</td>
<td>197.80</td>
<td>94.20%</td>
<td>27.65%</td>
</tr>
<tr>
<td>7</td>
<td>Various colors</td>
<td>0.98</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>94.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>8</td>
<td>Various colors</td>
<td>0.58</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>94.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>9</td>
<td>Various colors</td>
<td>0.47</td>
<td>100.00%</td>
<td>70.00%</td>
<td>30.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>79.00%</td>
<td>70.00%</td>
<td>21.00%</td>
<td>319,901</td>
<td>2,000</td>
<td>47.80</td>
<td>197.80</td>
<td>94.20%</td>
<td>27.65%</td>
</tr>
<tr>
<td>10</td>
<td>Various colors</td>
<td>0.98</td>
<td>100.00%</td>
<td>73.82%</td>
<td>26.18%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>81.87%</td>
<td>73.82%</td>
<td>3.15</td>
<td>319,901</td>
<td>2,000</td>
<td>94.40</td>
<td>143.40</td>
<td>94.20%</td>
<td>5.47%</td>
</tr>
<tr>
<td>11</td>
<td>Adhesive</td>
<td>2.55</td>
<td>100.00%</td>
<td>76.25%</td>
<td>23.75%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>83.75%</td>
<td>76.25%</td>
<td>15.75</td>
<td>319,901</td>
<td>2,000</td>
<td>480.04</td>
<td>2102.58</td>
<td>94.20%</td>
<td>27.84%</td>
</tr>
</tbody>
</table>

Total Potential Emissions: 2,459.73 10,773.62 142.66 624.87 96.35 1661.29

Notes:
Amount of coverage and color will very depending on label that is made. Potential emission calculations based on nominal representative maximum solids coverage.

All calculations based upon highest VOC content labels printed at facility.

Maximum speed for applying designated adhesive used for each press.

Heated offset printing has an assumed flash off of 90%. Other types of printers have a flash off of 100%.

There are negligible emissions from clean-up operations.

Methodology:
Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 Min/Hour * 8,760 Hours per Year
VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (solitaries minus water) * Flash Off % * Throughput * Tons per 2,000 pounds = Tons per Year

Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Overall Control Efficiency)) * VOC Input Limitation (%)
**Press #7**

Throughput for Packaging Rotogravure Printing Press

**Press I.D.**

<table>
<thead>
<tr>
<th>Max Line Speed (ft/min)</th>
<th>Convert Feet to Inches</th>
<th>Maximum Print Width (in)</th>
<th>60 Min/Hour</th>
<th>8,760 HR</th>
<th>YEAR</th>
<th>51,000,000</th>
<th>Potential MMin²/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

New Press #7

**Source Name:** Multi-Color Corporation  
**Address City IN Zip:** 2281 South U.S. 31, Scottsburg, Indiana 47170  
**Renewal:** 143-43290-00007  
**SSM Permit No.:** 143-43360-00007  
**Permit Reviewer:** Shelby O'Neal

**PRINTING VOC:**

<table>
<thead>
<tr>
<th>Unit No.</th>
<th>Ink Name</th>
<th>Varnish</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Various colors</th>
<th>Adhesive</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2.08%</td>
<td>0.58%</td>
<td>3.47%</td>
<td>0.58%</td>
<td>0.58%</td>
<td>3.47%</td>
<td>0.58%</td>
<td>0.58%</td>
<td>2.55%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>75.42%</td>
<td>73.82%</td>
<td>70.05%</td>
<td>73.82%</td>
<td>73.82%</td>
<td>70.05%</td>
<td>73.82%</td>
<td>73.82%</td>
<td>76.79%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>30.00%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

**Notes:**  
Amount of coverage and color will vary depending on label that is made. Potential emission calculations based on nominal representative maximum solids coverage.  
All calculations based upon highest VOC content labels printed at facility  
Maximum speed for applying designated adhesive used for each press  
Heatset offset printing has an assumed flash-off of 80%. Other types of printers have a flash-off of 100%  
There are negligible emissions from clean-up operations.

**Methodology:**  
Throughout = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year * MMin²/Year  
VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (solubles minus water) * Flash-off * Throughput * Tons per 2,000 pounds * Tons per Year  
Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Overall Control Efficiency)) * VOC Input Limitation (%)

<table>
<thead>
<tr>
<th>Thinner</th>
<th>Ink Name</th>
<th>Weight %</th>
<th>Ink Weight %</th>
<th>% Thinner</th>
<th>As-Applied Weight %</th>
<th>Water</th>
<th>As-Applied Weight %</th>
<th>Water</th>
<th>Maximum Coating Coverage lbs/MM²</th>
<th>VOC</th>
<th>Water</th>
<th>Potential Throughput</th>
<th>Potential VOC Emissions</th>
<th>Overall Control</th>
<th>Controlled VOC</th>
<th>VOC Input Limitation</th>
<th>Limited/Controlled VOC</th>
<th>Total Limited VOC input</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>82.79%</td>
<td>12.09%</td>
<td>100%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
<tr>
<td></td>
<td></td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>152.61</td>
<td>668.44</td>
<td>770.70</td>
<td>337.45</td>
<td>517,190</td>
<td></td>
<td></td>
<td>2,000</td>
<td>590.92</td>
<td>94.20%</td>
<td>8.85%</td>
<td>38.77%</td>
<td>5.98%</td>
<td>103.07</td>
</tr>
</tbody>
</table>

**Total Potential Emissions:**  
3,976.70 pounds  
17,417.92 tons  
230.65 tons per year  
1,010.24 tons per year  
155.78 tons per year  
2685.84 tons per year
**Degreasing**

**Source Name:** Multi-Color Corporation  
**Address City IN Zip:** 2281 South U.S. 31, Scottsburg, Indiana 47170  
**Renewal:** 143-43290-00007  
**SSM Permit No.** 143-43360-00007  
**Permit Reviewer:** Shelby O’Neal

### Degreasing Solvents

<table>
<thead>
<tr>
<th>Degreasing Operations</th>
<th>Solvent Used</th>
<th>Solvent Density (lbs/gal)</th>
<th>Maximum Usage (gal/yr)</th>
<th>Maximum Usage (lbs/yr)</th>
<th>Weight % VOC</th>
<th>Weight % HAP</th>
<th>VOC Emissions (tons/yr)</th>
<th>HAP Emissions (tons/yr)</th>
<th>Control Equipment</th>
<th>Overall Control Efficiency</th>
<th>Controlled VOC (tons/yr)</th>
<th>Controlled HAP (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PW3</td>
<td>S-8000</td>
<td>7.88</td>
<td>4272</td>
<td>33663</td>
<td>100.00%</td>
<td>0.00%</td>
<td>16.83</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>0.98</td>
<td>0.00</td>
</tr>
<tr>
<td>PW4</td>
<td>S-8000</td>
<td>7.88</td>
<td>4272</td>
<td>33663</td>
<td>100.00%</td>
<td>0.00%</td>
<td>16.83</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>0.98</td>
<td>0.00</td>
</tr>
<tr>
<td>Manual Parts Washer (PW5)</td>
<td>S-8000</td>
<td>7.88</td>
<td>24455</td>
<td>192705</td>
<td>100.00%</td>
<td>0.00%</td>
<td>96.35</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>5.59</td>
<td>0.00</td>
</tr>
<tr>
<td>PW6</td>
<td>S-8000</td>
<td>7.88</td>
<td>4272</td>
<td>33663</td>
<td>100.00%</td>
<td>0.00%</td>
<td>16.83</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>0.98</td>
<td>0.00</td>
</tr>
<tr>
<td>PW7</td>
<td>S-8000</td>
<td>7.88</td>
<td>8760</td>
<td>69029</td>
<td>100.00%</td>
<td>0.00%</td>
<td>34.51</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>2.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PW8</td>
<td>S-8000</td>
<td>7.88</td>
<td>4272</td>
<td>33663</td>
<td>100.00%</td>
<td>0.00%</td>
<td>16.83</td>
<td>0.00</td>
<td>OXD#2 or OXD#7 or (OXD#8 - to be constructed 2021)</td>
<td>94.20%</td>
<td>0.98</td>
<td>0.00</td>
</tr>
<tr>
<td>Insignificant Degreasers</td>
<td>S-8000</td>
<td>7.88</td>
<td>218.81</td>
<td>1724</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.86</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>0.86</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Total Potential Emissions (tons/yr)**

<table>
<thead>
<tr>
<th>Degreasing Operations</th>
<th>VOC Emissions (tons/yr)</th>
<th>HAP Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>146.85</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

VOC Emissions (tpy) = Material Usage (lbs/yr) * Weight % VOC * 1 ton/2000 lbs  
HAP Emissions (tpy) = Material Usage (lbs/yr) * Weight % HAP * 1 ton/2000 lbs
TSD Appendix A: Emissions Calculations
Seaming

Source Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Renewal: 143-43290-00007
SSM Permit No. 143-43360-00007
Permit Reviewer: Shelby O'Neal

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Unit ID</th>
<th>meter/minute</th>
<th>lbs/1,000,000 meter</th>
<th>lbs/mins</th>
<th>lbs/day</th>
<th>tons of VOC/year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seaming Mach. (500 mpm)</td>
<td>Seam Mach 1</td>
<td>500</td>
<td>31.84</td>
<td>0.01592</td>
<td>22.92</td>
<td>4.18</td>
</tr>
<tr>
<td>Seaming Mach. (500 mpm)</td>
<td>Seam Mach 2</td>
<td>500</td>
<td>31.84</td>
<td>0.01592</td>
<td>22.92</td>
<td>4.18</td>
</tr>
<tr>
<td>Seaming Mach. (500 mpm)</td>
<td>Seam Mach 3</td>
<td>500</td>
<td>31.84</td>
<td>0.01592</td>
<td>22.92</td>
<td>4.18</td>
</tr>
</tbody>
</table>

Total PTE 12.55

Maximum Application Rate is 31.84 lb solvent/1,000,000 meters
Note: Solvents are assumed to be 100% VOCs
January 13, 2021

Aron Kratky
Multi-Color Corporation
4053 Clough Woods Dr
Batavia, OH 45103

Re: Public Notice
Multi-Color Corporation
Permit Level: Title V Renewal
Title V Sig Source Mod Minor PSD
Permit Number: 143-43290-00007 &
143-43360-00007

Dear Mr. Kratky:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

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 (without supporting documents) 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 Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

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

OAQ has submitted the draft permit package to the Scott County Public Library – Scottsburg Branch, 108 South Main Street in Scottsburg, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed 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 Shelby O’Neal, 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 3-8578 or dial (317) 233-8578.

Sincerely,

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020
January 13, 2021

To: Scott County Public Library – Scottsburg Branch

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: Multi-Color Corporation
Permit Number: 143-43290-00007 & 143-43360-00007

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 13, 2021
Multi-Color Corporation
143-43290-00007 & 143-43360-00007

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 13, 2021

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

**Permit Number:**  143-43290-00007 & 143-43360-00007
**Applicant Name:**  Multi-Color Corporation
**Location:**  Scottsburg, Scott County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at: http://www.in.gov/ai/appfiles/idem-caats/

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

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

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

Affected States Notification  1/9/2017
**Mail Code 61-53**

<table>
<thead>
<tr>
<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>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Aron Kratky Multi Color Corporation 4053 Clough Woods Dr Batavia OH 45103 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Darin Brown Plant Manager MULTI COLOR CORPORATION 2281 S US Hwy 31 Scottsburg IN 47170 (RO CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Scott County Health Department 1296 N. Gardner St Scottsburg IN 47170-1400 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Scottsburg City Council and Mayors Office 2 E. McClain Street Scottsburg IN 47170 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Scott County Public Library - Scottsburg 108 S Main St Scottsburg IN 47170-1892 (Library)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Kathy Moore Keramida Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td>Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>Jim Binkley Scottsburg Electric Department 2162 South US 31 Scottsburg IN 47170 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td>Resident 2129 South US 31 Scottsburg IN 47170 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total number of pieces Listed by Sender

Total number of Pieces Received at Post Office

Postmaster, Per (Name of Receiving employee)

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.