



TO: Interested Parties / Applicant
RE: Zimmer Custom-Made Packaging / 097-23598-00029
FROM: Felicia A. Robinson *FR*
Administrator
City of Indianapolis
Office of Environmental Services

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

September 7, 2006



David J. Brown
Zimmer Custom-Made Packaging
1450 East 20th Street
Indianapolis, IN 46218

Certified Mail 7000 0600 0023 5186 5485

Re: Second Notice Only Change 097- 097-23598-00029 to
Minor Source Operating Permit 097-15253-00029

Dear Mr. Brown:

Zimmer Custom-Made Packaging was issued a Minor Source Operating Permit on September 22, 2003 for a stationary printing operation. A First Notice Only Change 097-20142-00029 was issued on June 6, 2005. An application was received on August 22, 2006, requesting the installation of a new flexographic printing press.

Based on the information submitted in the application (see Attachment A page 1 of 1), the additional printing press will have a potential to emit 0.88 tons/yr VOC and 0.52 tons/yr of single HAP. Glycol Ether is the only HAP emitted from this new press.

Therefore, the resulting VOC and HAP emissions are less than 1 ton/yr. Pursuant to 326 IAC 2-6.1-6 (Permit revisions; MSOP) and 326 IAC 2-1.1-3 (Exemptions), this change qualifies for a Notice Only Change.

The current source's potential to emit for VOC is 51.71 tons/yr, single HAP is less than 10 tons/yr and combined HAPs is less than 25 tons/yr. This modification VOC and HAPs emission increase will not change the source's permit status and adds an emission unit of the same type that is already permitted and will comply with the same applicable requirements and permit terms and conditions as the existing unit.

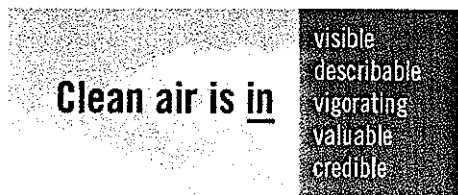
Pursuant to the provisions of 326 IAC 2-6.1-6(d)(13) the permit is hereby modified as follows: (the bold language is new language that has been added, and the language with a line through it has been taken out).

1. Condition A.2 and Facility Description D.1 have been changed as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (m) **One flexographic press, identified as Unit ID#20, to be constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.**



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Department of Public Works
Office of Environmental Services
2700 Belmont Avenue | 317-327-2234
Indianapolis, IN 46221 | Fax 327-2274
TDD 327-5186
indygov.org/dpw

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Flexographic Presses and Faustel Line

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.
- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.
- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.
- (m) One flexographic press, identified as Unit ID#20, to be constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.**

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

2. Conditions D.1.1, D.1.2, D.1.4, and D.1.6 have been changed as follows:

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to flexographic presses #16, #17, #18, and #19, and #20 except when otherwise specified in 40 CFR 60, Subpart RR.

D.1.2 Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RR]

- (a) Flexographic presses #16, #17, #18, and #19, and #20 are subject to the requirements of 40 CFR 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). Record keeping requirements applicable to these units are included in Condition D.1.7(b) of this section.
- (b) Any change or modification which may increase the input of VOC to flexographic press #16, #17, #18, or #19, or #20 to fifty (50) tons per twelve (12) consecutive month period must be approved by IDEM, OAQ and OES before any such change may occur.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water for flexographic presses #10, #12, #14, #15, #16, #17, #18, and #19, and #20.

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used less water.
- (b) Pursuant to 40 CFR 60, Subpart RR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, and #19, and #20.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

3. IDEM OAQ's mailing address has been revised as follows:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

4. Condition B.6 has been revised to correct IDEM OAQ's mailing address as follows:

~~Compliance Branch, Office of Air Quality~~ **Indiana Department of Environmental Management**
~~Indiana Department of Environmental Management~~ **Compliance Branch, Office of Air Quality**
100 North Senate Avenue
Indianapolis, IN 46204, -2251

5. The fax number for IDEM, OAQ has been updated.

6. IDEM and OES have decided to include the following updates to further address and clarify the permit terms and the terms of the conditions. This includes changes to the following B and C conditions: Annual Fee Payment, and Performance Testing.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to ~~IDEM, OAQ~~ **OES** within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: ~~1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section)~~ **317-327-2234 (ask for OES Air Compliance)**, to determine the appropriate permit fee.

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. **The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the ~~source~~ **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.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Anh-tuan Nguyen at (317) 327-2353 or tnguyen@indygov.org.

Sincerely,



Felicia A. Robinson
Administrator

Enclosure: Attachment A
Revised Permit

FAR/AN

cc: Files
Permits
Compliance - Matt Mosier
U.S. EPA, Region V
Mindy Hahn, IDEM OAQ
Marion County Health Department



MINOR SOURCE OPERATING PERMIT
Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis Office of Environmental Services

Zimmer Custom-Made Packaging
1450 East 20th Street
Indianapolis, Indiana 46218

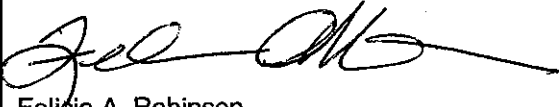
(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-15253-00029	
Issued by: Originally signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: September 22, 2003 Expiration Date: September 22, 2008

First Notice Only Change: 097-20142-00029

Issuance Date: June 6, 2005

Second Notice Only Change: 097-23598-00029	
Issued by:  Felicia A. Robinson Administrator Indianapolis Office of Environmental Services	Condition Changed: A.2, D.1, D.1.1, D.1.2, D.1.4, and D.1.6 Issuance Date: September 7, 2006 Expiration Date: September 22, 2008

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Office of Environmental Services

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary printing source.

Authorized Individual:	Central Engineering Manager
Source Address:	1450 East 20 th Street, Indianapolis, Indiana 46218
Mailing Address:	1450 East 20 th Street, Indianapolis, Indiana 46218
General Source Phone Number:	(317) 263-3436
SIC Code:	2671
Source Location Status:	Marion
County Status:	Non-attainment for 8-hour ozone and Non-attainment for PM2.5; attainment for all other criteria pollutants
Source Status:	Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.
- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with

emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.

- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.
- (j) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (k) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.
- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (m) One flexographic press, identified as Unit ID#20, to be constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

SECTION B

GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (d) The notification 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, and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-30-3-1]

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, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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, at reasonable times, 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 317-327-2234 (ask for OES Air Compliance), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [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 Permit Revocation [326 IAC 2-1.1-9]**
Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:
- (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.
- C.3 Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) 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.4 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).
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES 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.7 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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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. 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) 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, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Flexographic Presses and Faustel Line

- (a) One flexographic press, identified as Unit ID#10, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 38 inches, with emissions uncontrolled, exhausting to stack S-5.
- (b) One flexographic press, identified as Unit ID#12, constructed prior to 1977, with a maximum operating capacity of 800 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-6.
- (c) One flexographic press, identified as Unit ID#14, constructed prior to 1977, with a maximum operating capacity of 1,050 feet per minute and a maximum print width of 44 inches, with emissions uncontrolled, exhausting to stack S-7.
- (d) One flexographic press, identified as Unit ID#15, constructed prior to 1977, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 46 inches, with emissions uncontrolled, exhausting to stack S-8.
- (e) One flexographic press, identified as Unit ID#16, constructed in 1991, with a maximum operating capacity of 600 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-9.
- (f) One CentralFlex Printing press, identified as Unit ID#17, constructed in 1997, with a maximum operating capacity of 1,000 feet per minute and a maximum print width of 55.5 inches, with emissions uncontrolled, exhausting to stack S-11.
- (g) One flexographic press, identified as Unit ID#18, constructed in 1999, with a maximum operating capacity of 500 feet per minute and a maximum print width of 22 inches, with emissions uncontrolled, exhausting to stacks S-10, S-11, S-12, S-13, and S-14.
- (h) One flexographic press, identified as Unit ID#19, constructed in 1999, with a maximum operating capacity of 800 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stacks S-15, S-16, and S-17.
- (i) One Faustel Line, identified as Faustel Line, constructed prior to 1977, with a maximum operating capacity of 400 feet per minute and a maximum print width of 72 inches, exhausting to stack S-10.1.
- (m) One flexographic press, identified as Unit ID#20, to be constructed in 2006, with a maximum operating capacity of 500 feet per minute and a maximum print width of 45 inches, with emissions uncontrolled, exhausting to stack S-20.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to flexographic presses #16, #17, #18, #19, and #20 except when otherwise specified in 40 CFR 60, Subpart RR.

D.1.2 Pressure Sensitive Tape and Label Surface Coating Operations [326 IAC 12] [40 CFR 60, Subpart RR]

- (a) Flexographic presses #16, #17, #18, #19, and #20 are subject to the requirements of 40 CFR 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). Record keeping requirements applicable to these units are included in Condition D.1.7(b) of this section.
- (b) Any change or modification which may increase the input of VOC to flexographic press #16, #17, #18, #19, or #20 to fifty (50) tons per twelve (12) consecutive month period must be approved by IDEM, OAQ and OES before any such change may occur.

D.1.3 Volatile Organic Compounds (VOC) Content Limitations, Faustel Line [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5(b) (Paper Coating Operations), the owner or operator shall not allow the discharge into the atmosphere of VOC from the Faustel Line, a 100% saturation process, in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.
- (b) Compliance with 326 IAC 8-2-5(b) is ensured because the source will use only non-VOC based surface coatings. For any change or modification to use VOC based surface coatings in the Faustel line, the source must receive prior approval from IDEM, OAQ and OES.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the volatile fraction of the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compounds and seventy-five percent (75%) by volume or more of water for flexographic presses #10, #12, #14, #15, #16, #17, #18, #19, and #20.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.4 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 coating manufacturer.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used less water.
- (b) Pursuant to 40 CFR 60, Subpart RR, the Permittee shall maintain a twelve (12) consecutive month record of the amount of solvent applied in the coating at flexographic presses #16, #17, #18, #19, and #20.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Boilers

- (j) One (1) natural gas-fired boiler, identified as Boiler 1, constructed prior to 1977, with a maximum heat input capacity of 11 million British thermal units per hour, exhausting to stack S-1.
- (k) One (1) natural gas-fired boiler, identified as Boiler 2, constructed prior to 1977, with a maximum heat input capacity of 12.5 million British thermal units per hour, exhausting to stack S-2.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Source of Indirect Heating), the particulate emissions from Boiler 1 and Boiler 2 shall each be less than 0.52 pounds per million British thermal unit of heat input.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Degreasers

- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
Indianapolis Office of Environmental Services
AIR QUALITY MANAGEMENT SECTION
MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Zimmer Custom-Made Packaging
Address:	1450 East 20 th Street
City:	Indianapolis, Indiana 46218
Phone #: XXX	(317)263-3436
MSOP #:	097-15253-00029

I hereby certify that Zimmer Custom-Made Packaging is still in operation.
 no longer in operation.

I hereby certify that Zimmer Custom-Made Packaging is in compliance with the requirements of MSOP 097-15253-00029.
 not in compliance with the requirements of MSOP 097-15253-00029.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865
Indianapolis Office of Environmental Services
AIR QUALITY MANAGEMENT SECTION

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES ? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Attachment A: Emissions Calculations

Flexographic Presses

Company Name: Zimmer Custom-Made Packaging
 Address City IN Zip: 1450 East 20th Street, Indianapolis, IN 46218
 Permit Number: 097-23598-00029

Pit ID: 097-00029

Reviewer: A. Nguyen

Date: 8/24/2006

Ink Coverage	lbs ink/1000ft ²	% coverage
	1	20

Emission Unit	Line Speed (ft/min)	Printing Width (in)	Maximum Printing Rate (MMin ² /hr)	Maximum Coverage (lb/MMin ²)	Max Ink Usage Rate (lbs/hr)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (ton/yr)	Potential Glycol Ether Emissions (ton/yr)
Flexographic Press #10	1,000	38	27.36	1.39	38	1.23	29.44	5.37	0.05
Flexographic Press #12	600	44	25.344	1.39	35.2	1.14	27.27	4.98	0.05
Flexographic Press #14	1,050	44	33.264	1.39	46.2	1.49	35.79	6.53	0.07
Flexographic Press #15	1,000	46	33.12	1.39	46	1.48	35.63	6.50	0.07
Flexographic Press #17	600	45	19.44	1.39	27	0.87	20.92	3.82	0.04
Flexographic Press #16	1,000	55.5	39.96	1.39	55.5	2.96	70.94	12.95	0.13
Flexographic Press #18	500	22	7.92	1.39	11	0.59	14.06	2.57	0.05
Flexographic Press #19	800	45	25.92	1.39	36	1.92	46.02	8.40	0.16
Flexographic Press #20	500	45	16.2	1.39	22.5	0.17	4.03	0.74	0.52
	500	45	16.2	1.39	22.5	0.20	4.79	0.88	0.16
							Total	51.99	1.13

Highest HAP
Highest VOC

Presses #10, #12, #14, #15, and #17

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Blue Ink	0.2	7.98	0.03	1.00%
Extender	7.37	7.98	0.92	0.00%
Ink as applied*			0.03	1.00%

*Uses one ounce of extender per gallon of ink

Presses #16, #18, and #19

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Film Ink	0.425	7.98	0.05	1.94%

Press #20

	lb VOC/gal	lb ink/gal	lb VOC/lb ink	Glycol Ether (wt %)
Red Ink	0.07	9.37	0.0075	0.70
Black Ink	0.08	9.01	0.0089	0.18

Methodology

Maximum Printing Rate (MMin²/hr) = Line Speed (ft/min) * 12 (in/ft) * 60 (min/hr) * Printing Width (in) / 10⁶ (in²/MMin)

Maximum Coverage (lb/MMin²) = lbs ink/1000ft² * % Coverage/100 / 144 (in²/ft²) * 10⁶ (MMin²/in)

Maximum Ink Usage Rate (lb/hr) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²)

Potential VOC Emissions (lb/day) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²) * lb VOC/lb ink

Potential VOC Emissions (ton/yr) = Maximum Printing Rate (MMin²/hr) * Maximum Coverage (lb/MMin²) * lb VOC/lb ink * 24 (hr/day)

Potential Glycol Ether Emissions (ton/yr) = Potential VOC Emissions (ton/yr) * Glycol Ether (wt %)