

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

June 26, 2024

VIA ELECTRONIC MAIL

Ken Sheets
Web Industries Fort Wayne, Inc.
3925 Ardmore Avenue
Fort Wayne, Indiana 46802
ksheets@webindustries.com

Re: Inspection Summary/Violation Letter

Web Industries Fort Wayne, Inc.

Source ID 003-00426 Fort Wayne, Allen County

Dear Ken Sheets:

On June 6, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Web Industries Fort Wayne, Inc., located at 3925 Ardmore Avenue in Fort Wayne, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment

Inspection Results: Violations were observed

At the time of the inspection, the following violations were noted:

1) The 64" flexographic printing press, identified as FP-21, is subject to the Graphic Arts Operations VOC emissions provisions of 326 IAC 8. The 64" flexographic printing press is equipped with a 2.854 MMBtu per hour thermal oxidizer, identified as C-21, to control VOC emissions. During the inspection, it was determined that you changed the method of compliance from the use of control devices (use of thermal oxidizer C-21) to use of compliant coatings and did not certify to IDEM that you are in compliance with the requirements of 326 IAC 8-1-10(b)(1)-(5). This is a violation of Permit F003-45270-00426 condition D.1.10(b) Reporting Requirements.

Within fourteen (14) days of the date of this letter, a written detailed explanation, documenting how compliance with each of the violations listed above will be achieved and maintained, must be submitted to this office. The detailed explanation shall include a certification to IDEM. 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.

Web Industries Fort Wayne, Inc. (Plant ID 003-00426) Page 2 of 2

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

The required submittal should be emailed to pburton@idem.in.gov or mailed to:

Patrick Burton, Compliance Inspector Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue Indianapolis, Indiana 46204

The Office of Air Quality will not take legal action at this time. Failure to respond adequately to this Violation Letter may result in a referral for formal enforcement action. Please direct any questions to Patrick Burton, Compliance Inspector, at (260) 433-4538 or by email at pburton@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Kurt Graham, P.E., Chief Compliance Section 2 Office of Air Quality

Kurt Fraham

ACES ID: 298094, 298387 (VL)

ENCLOSURE

cc: Patrick Burton, Compliance and Enforcement Branch, Office of Air Quality
Allen County Health Department
Mr. Dan DeWindt, Web Industries Fort Wayne, Inc., ddewindt@webindustries.com

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FIELD INSPECTION REPORT



SOURCE INFORMATION			
SOURCE NAME	Web Industries Fort Wayne, I	nc.	
SOURCE LOCATION	3925 Ardmore Avenue, Fort Wayne, Indiana		
SOURCE LOCATION	Allen County		
MAILING ADDRESS	3925 Ardmore Avenue, Fort V	Wayne, Indiana 46802	
PLANT ID	003-00426		
PERMIT INFORMATION	Permit Type: Permit Number: Permit Expiration Date: VFC Document No.(hyperlink	FESOP 45270 12/28/32 2): 83408116	
ATTAINMENT STATUS	☑ Attainment for all criteria p☐ Nonattainment for ☐SO₂		PM ₁₀ □PM _{2.5}
SOURCE STATUS	□ PSD Major (326 IAC 2-2)□ Emission Offset (326 IAC 2□ Acid Rain (326 IAC 21)		
SOURCE DESCRIPTION	This source is a stationary flex	xographic printing operation.	
INSPECTION INFORMATION			
INSPECTED BY	Patrick Burton		
INSPECTION DATE AND TIME	June 6, 2024	TIME IN: 1:30PM	TIME OUT: 3:45PM
REPORTED BY	Patrick Burton	REPORT DATE: 6/20/24	
COMPLIANCE PERIOD REVIEWED	2019 to 2024		
INSPECTION NOTIFICATION		☐ Announced:	
INSPECTION OBJECTIVE(S)	☑ Compliance Monitoring S☐ Mega-Site: ☐ FCE ☐ F☐ Other:	PCE	mmitment mplaint rveillance

SOURCE PERSONNE	L INTERVIEWED		
Name	Title	Phone Number	Email Address
Kenneth Sheets	Plant Manager	260-435-4428	ksheets@webindustries.com
Dan DeWindt	FVS Leader	260-435-4417	ddewindt@webindustries.com

Complaint:

na

The purpose of this inspection is to conduct a routine air compliance inspection.

Violation/Warning:

298094

na

Inspection:

Complaint:

ACES TRACKING NUMBER(S)

RM TRACKING NUMBER(S)

INSPECTION BACKGROUND

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
09/04/2019	Commitment	Violations Noted	During the 09/4/2019 inspection, a violation of permit F 003-38950-00426 condition D.1.6 Testing Requirements was noted for failing to perform

298387

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INSPECTION AND	COMPLAINT HISTORY (PR	REVIOUS 5 YEARS)	
			a timely stack test for VOC control efficiency testing on thermal oxidizer C-21. Referred to Enforcement

			Referred to Enforcement
COMPLIANCE H	HISTORY (PREVIOUS 5 YEA	ARS)	
Informal Enforc			
Date Issued	Action Taken	Describe Violation(s)	
None			
Formal Enforce	ment Actions	•	
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
			Pursuant to Federally Enforceable State Operating Permit (FESOP) No. 003- 38950-00426 ("Permit") condition D.1.7, Respondent shall operate the thermal oxidizer at or above the three-hour average temperature as determined during the most recent compliant stack test, and take reasonable response steps when the three-hour average is below that temperature.
2022-28436-A	Formal Enforcement	\$ 4,800	Respondent failed to take reasonable response steps when the three-hour average temperature of the thermal oxidizer was below the minimum temperature determined during the February 27, 2020 stack test, from March 25, 2020, through February 10, 2021, in violation of Permit condition D.1.7. Referral: ACES# 266577
2021-27582-A	Formal Enforcement	\$ 6,250	Resolution letter 83492705 issued June 8, 2023. Pursuant to condition D.1.2(a)(3) of Federally Enforceable State Operating Permit (FESOP) No. 003-38950-00426 ("Permit"), Respondent shall install and operate thermal oxidizer C-21 to oxidize at least ninety percent (90%) of nonmethane volatile organic compounds ("VOC") to carbon dioxide and water. Respondent operated thermal oxidizer C-21 at 83.7% VOC destruction efficiency during the stack test on December 18, 2019, in violation of Permit condition D.1.2(a)(3). Referral: ACES# 247667 Resolution letter 83159478 issued May 20, 2021.
2019-26461-A	Expedited Enforcement	\$500	During the 09/4/2019 inspection, a violation of permit F 003-38950-00426 condition D.1.6 Testing Requirements was noted for failing to perform a timely stack test for VOC control efficiency testing on thermal oxidizer C-21. Referral: ACES# 240541

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COMPLIANCE L	IISTODY (DDEVIOUS & VEAL	Pe)			
COMPLIANCE	IISTORY (PREVIOUS 5 YEA	KO)	Possilution lette	or 920209E6 issues	d January 24
			2020.	er <u>82920856</u> issue	u January ZI,
Other Relevant	<u>Actions</u>				
Action Taken	Comments				
None					
PERMIT SECTION					
Emission Units a	nd Control Devices:				
solvent-based ink oxidizer, identified exhausting to Sta	graphic printing press, identifi k, with a maximum line speed d as C-21, as control and exh ack S-21(B) when using water	of 1,500 feet pe austing to Stack -based ink.	r minute, using a	2.854 MMBtu per ho	our thermal
	mission Limits or Applicable S				
	$O_X \square CO \boxtimes VOC \square PM$	□ PM ₁₀ □ PM	_{2.5} □ HAPS		
Applicable Rules					
326 IAC 2-8-4,	326 IAC 8				
Requirement:	Requirement: Applicable Violation Noted				Violation Noted
Emission Lim	itations and Standards				☐ Yes ⊠ No
Preventive M	Preventive Maintenance Plan			☐ Yes ⊠ No	
Compliance Determination Requirements			☐ Yes ⊠ No		
Testing Requ	irements				☐ Yes ⊠ No
Compliance I	Monitoring Requirements				☐ Yes ⊠ No
Recordkeepir	ng Requirements				☐ Yes ☒ No
Types of	Records Reviewed: coating re	ecords			
Reporting Re	Reporting Requirements				
Observations and					
The 64" flexographic printing press, identified as FP-21, was observed during the inspection. The press is operable but was not in operation during the inspection. The press is equipped with a thermal oxidizer, identified as C-21, to control VOC emissions. Mr. DeWindt indicated that the source uses compliant coatings to comply with the VOC limits and does not use the thermal oxidizer. Mr. DeWindt indicated that the source has achieved compliance with VOC limits through the use of compliant coatings for at least the last 12 months. In addition, Mr. DeWindt indicated that the source submitted an air permit application to IDEM in April 2024 to transition to a MSOP primarily through the use of VOC compliant coatings. Upon changing the method of compliance for an existing coating facility from use of control devices to the use of compliant coatings, Permit F003-45270-00426 condition <i>D.1.10 Reporting Requirements</i> requires the					
the owner or ope	rator of the coating source to 326 IAC 8-1-10(b)(1)-(5). The	certify to IDEM t	hat the coating fa	cility is in compliand	

- (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.
- (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

The source changed the method of compliance from the use of control devices to use of compliant coatings and did not certify to IDEM that it is in compliance with the requirements of 326 IAC 8-1-10(b)(1)-(5). This is a **violation of Permit F003-45270-00426 condition D.1.10(b) Reporting Requirements**.

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PERMIT SECT	TION D.1	1		
Permit Section				
		e observed or determined for this permit section at the time		
	ing viola	ations were determined for this permit section at the time	of the inspection:	
not certify to ID	DEM that	ne method of compliance from the use of control devices to it it is in compliance with the requirements of 326 IAC 8-1-0426 condition <i>D.1.10(b)</i> Reporting Requirements		
PERMIT SECT				
Emission Units				
Insignificant A	Activitie	S		
(d)		ers and solvents characterized as follows where the use oned, does not exceed one hundred forty-five (145) gallons		
	(1)	Having a vapor pressure equal to or less than two kilo functions (15 mm Hg) or three-tenths pound per square degrees Celsius (38°C) (one hundred degrees Fahrenham)	inch (0.3 psi)) méàs	
	(2) Having a vapor pressure equal to or less than seven-tenths kilo Pascals (0.7kPa) (five millimeters of mercury (5mm Hg) or one-tenth pound per square inch (0.1 psi) measured at twenty degrees Centigrade (20°C) (sixty-eight degrees Fahrenheit (68°F).			
Pollutants with	Emissic	on Limits or Applicable Standards:		
	NO _X	□ CO ☑ VOC □ PM □ PM ₁₀ □ PM _{2.5} □ HAPS		
Applicable Rul	es:			
• 326 IAC 8-	3-2, 326) IAC 8-3-8		
Requirement:			Applicable	Violation Noted
Emission L	imitation	ns and Standards	⊠ Yes □ No	☐ Yes ⊠ No
Preventive	Mainter	nance Plan		☐ Yes ⊠ No
Complianc	e Deterr	nination Requirements	☐ Yes ⊠ No	☐ Yes ⊠ No
Testing Re	quireme	ents	☐ Yes ⊠ No	☐ Yes ⊠ No
Complianc	e Monito	oring Requirements	☐ Yes ⊠ No	☐ Yes ☒ No
Recordkee	ping Re	quirements	⊠ Yes □ No	☐ Yes ⊠ No
Types	of Reco	rds Reviewed: solvent usage (containing VOC's) quarterl	y reports	
Reporting	Requirer	ments	☐ Yes ⊠ No	☐ Yes ☒ No
Observations a	and Com	nments:		
The source use	es low V	OC cleaning solvents. No violations were noted.		
Permit Section	Compli	ance Status:		
		e observed or determined for this permit section at the time ations were determined for this permit section at the time	•	
DEDMIT OF CO				
PERMIT SECT				
Emission Units		ontrol Devices:	mCon1 constructed	in

Web Industries Fort Wayne, Inc. (Plant ID 003-00426) Inspection Report Page 5 of 7 $\,$

PERMIT SECTION E.1			
2017, with maximum capacity of 54 HP, using no control, and exhausting indoo	rs.		
Under 40 CFR 60, Subpart JJJJ, this unit is considered an affected unit			
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an anexted unit			
Pollutants with Emission Limits or Applicable Standards:			
\square SO ₂ \boxtimes NO _X \square CO \square VOC \boxtimes PM \square PM ₁₀ \square PM _{2.5} \square HAPS			
Applicable Rule:			
40 CFR Part 60, Subpart JJJJ			
Applicability Information:			
The natural gas-fired emergency generator is subject to the New Source Pe Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ and 3 spark ignition ICE that commenced construction after June 12, 2006.			
Requirement:	Applicable	Violation Noted	
Emission Limitations/Standards		□ Yes ⊠ No	
Work Practice/Operating Requirements	⊠ Yes □ No	□ Yes ⊠ No	
Compliance Monitoring Requirements	□ Yes ⊠ No	□ Yes ⊠ No	
Testing Requirements	□ Yes ⊠ No	□ Yes ⊠ No	
Record Keeping Requirements	⊠ Yes □ No	☐ Yes ⊠ No	
Types of Records Reviewed: operating logs			
Reporting Requirements	⊠ Yes □ No	□ Yes ⊠ No	
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ⊠ No	☐ Yes ⊠ No	
Observations and Comments:			
The generator was not operating at the time of the inspection. No violations we	re noted.		
Descrit On the Organic Organic			
Permit Section Compliance Status:	a of the inequation		
 ☒ No violations were observed or determined for this permit section at the tim ☐ The following violations were determined for this permit section at the time 	·		
The following violations were determined for this permit section at the time	or the mapection.		
PERMIT SECTION E.2			
Emission Units and Control Devices:	ma Cam 1 . a a matrii vata d	in 2017 with	
One (1) Generac SG035 natural gas-fired emergency generator, identified as E maximum capacity of 54 HP, using no control, and exhausting indoors.	mGent, constructed	III 2017, WIUI	
maximam supusity of or the quality me serial of, and oxiduating industrie.			
Under 40 CFR 60, Subpart JJJJ, this unit is considered an affected facility.			
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected facility.			
Pollutants with Emission Limits or Applicable Standards:			
□ SO ₂ □ NO _X □ CO □ VOC □ PM □ PM ₁₀ □ PM _{2.5} ⋈ HAPS			
Applicable Rule:			
40 CFR 63, Subpart ZZZZ			
Applicability Information: The natural gas fired emergency generator is subject to the National Emission	ion Standards for Us	zordouo Air	
The natural gas-fired emergency generator is subject to the National Emissi Pollutants for National Emissions Standards for Hazardous Air Pollutants fo			
Combustion Engines, 40 CFR 63, Subpart ZZZZ, which is incorporated by reference as 326 IAC 20-82, because it			
is considered a stationary RICE at an area source of HAP emissions constr	ucted after June 12,	2006.	
Requirement:	Applicable	Violation Noted	
Emission Limitations/Standards		☐ Yes ⋈ No	

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PERMIT SECTION E.2		
Work Practice/Operating Requirements		□ Yes ⊠ No
Compliance Monitoring Requirements	☐ Yes ☐ No	□ Yes ⊠ No
Testing Requirements	☐ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements		□ Yes ⊠ No
Types of Records Reviewed: Reports on hours of operation.		
Reporting Requirements		☐ Yes ⊠ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ⊠ No	☐ Yes ⊠ No
Observations and Comments:		
The generator was not operating at the time of the inspection. No violations w	ere noted.	
Permit Section Compliance Status:		
☑ No violations were observed or determined for this permit section at the ti	me of the inspection.	
☐ The following violations were determined for this permit section at the time	e of the inspection:	
ADDITIONAL SOURCE COMPLIANCE REVIEW:		
The following reports are required and were reviewed:		
 ✓ Annual Compliance Certification(s) ✓ Deviation & Compliance 	Monitoring Report(s)	
☐ Annual Notification(s) ☐ Emission Statement(s)	Monitoring Report(s)	
The reports are consistent with inspection observations.		s □ No □ N/A
The permit accurately represents emission units observed on site.		s 🗆 No 🗆 N/A
Compliance assistance was provided during the inspection.		s □ No □ N/A
The source is required to have a Risk Management Plan [40 CFR 68]. ☐ Yes ☒ No		
If yes, the source has a plan. □ Yes □ No ☒ N/A		
If yes, the employees have been trained. ☐ Yes ☐ No ☒ N/A Additional Information and Comments:		
Additional Information and Comments: None		
Notice		
Additional Source Compliance Review Status:		
No violations were observed or determined for this permit section at the ti	me of the inspection.	
☐ The following violations were determined for this permit section at the time		
INSPECTION FINDINGS		
☐ No violations were observed or determined at the time of the inspection.		
☑ The following violations were determined at the time of the inspection:		
The source changed the method of compliance from the use of control devices	s to use of compliant o	coatings and did
not certify to IDEM that it is in compliance with the requirements of 326 IAC 8-Permit F003-45270-00426 condition D.1.10(b) Reporting Requirements.	1-10(b)(1)-(5). This is	a violation of
Within fourteen (14) from the date of the issuance of the inspection report, the certification to IDEM. The certification shall include the following:	source will be require	ed to submit the
(1) The name and location of the source.		
(2) The name, address, and telephone number of the person responsible for the	ne source.	
(3) Identification of each VOC emitting coating facility and identification of the (4) The name and identification number of each coating, as applied, used at each coating.	applicable emission lir	mitation.

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(5) The mass of VOC (exclude coating, as applied.	ing water and exempt compounds) per volume of coating and the volume of each
RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mr. DeWindt and Mr. Sheets prior to exiting the facility.

ATTACHMENTS	
 None 	