



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

June 27, 2024

VIA ELECTRONIC MAIL

Tyler Wall  
Sonoco Flexible Packaging  
6502 South US 31  
Edinburgh, IN 46124  
[tyler.wall@sonoco.com](mailto:tyler.wall@sonoco.com)

Re: Inspection Summary Letter  
Sonoco Flexible Packaging  
Source ID 081-00005  
Edinburgh, Johnson County

Dear Tyler Wall:

On June 20, 2024, I, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Sonoco Flexible Packaging, located at 6502 South US 31 in Edinburgh, Indiana. The 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: No violations were observed

Please direct any questions to me at 317-233-0432 or by email at [vison@idem.IN.gov](mailto:vison@idem.IN.gov).

Sincerely,

Vaughn Ison, Compliance Inspector  
Compliance Section 1  
Office of Air Quality

ACES ID: 298685

ENCLOSURE

cc: Vaughn Ison, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	Sonoco Flexible Packaging
SOURCE LOCATION	6502 South US 31, Edinburgh, Indiana Johnson County
MAILING ADDRESS	6502 South US 31, Edinburgh, IN 46124
PLANT ID	081-00005
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 45790 Permit Expiration Date: 7/30/2024 VFC Document No.(hyperlink): <a href="#">83434609</a>
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> CO <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> NO <sub>2</sub> <input type="checkbox"/> Pb <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub>
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input checked="" type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	Sonoco Flexible Packaging (Sonoco) operates a stationary commercial printing operation. A Part 70 Renewal (47176) is currently under review and is in public notice.

INSPECTION INFORMATION			
INSPECTED BY	Vaughn Ison		
INSPECTION DATE AND TIME	June 20, 2024	TIME IN: 12:00	TIME OUT: 2:15
REPORTED BY	Vaughn Ison	REPORT DATE: June 26, 2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	Since most recent inspection		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 298685	Complaint:	Violation: 298683
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	The most recent inspection occurred on 7/14/2022 with no violations determined. Sonoco operates 24/7 with a shutdown usually in late December to early January.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Tyler Wall	EHS Supervisor	812-526-5511, X297	tyler.wall@sonoco.com
Michael Leuck (via phone)	Plant Manager	812-526-5511, X230	michael.leuck@sonoco.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection	Result	Comments
7/14/2022	CMS	No Violations Noted	
8/20/2020	CMS	Violations Noted	Used ink containing a volatile % higher than the limit – D.1.4

<b>COMPLIANCE HISTORY (PREVIOUS 5 YEARS)</b>			
<b>Informal Enforcement Actions</b>			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
2/19/2024	Violation Letter	Late Stack Test Result	
8/20/2020	Violation Letter	Used ink containing a volatile % higher than the limit – D.1.4	
<b>Formal Enforcement Actions</b>			
<i>Case Number</i>	<i>Enforcement Type</i>	<i>Civil Penalty</i>	<i>Describe Violation(s)</i>
N/A		\$	
<b>Other Relevant Actions</b>			
<i>Action Taken</i>	<i>Comments</i>		
N/A			

<b>PERMIT SECTION D.1</b>
<b>Emission Units and Control Devices:</b>
<p>(a) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), constructed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, using thermal oxidizer 6RL as control, using natural gas, with a heat input rate of 24.0 MMBtu/hr, and exhausting to stack S11. Equipped with adhesive applicator and enclosed in a permanent total enclosure.</p> <p>(b) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), constructed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, using thermal oxidizer 8RL as control, using natural gas, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack 13. Equipped with adhesive applicator and enclosed in a permanent total enclosure.</p> <p>(c) One (1) 5X extrusion coater/laminator, identified as EU 201, constructed before 1987, using no control, and exhausting to stack 21. Product being coated is web substrate packaging material, application method used is roll coating, and consisting of the following units:                      (1) One (1) extrusion laminator;                      (2) One (1) coating/adhesive lamination deck;                      (3) One (1) coating deck;                      (4) Two (2) coating station dryers.</p> <p>(d.1) One (1) 6X extrusion coater/laminator, identified as EU 204, constructed in 1996, using 8RL thermal oxidizer as control, using natural gas, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack 13. Product being coated is web substrate packaging material, application method used is roll coating, and consisting of the following units:                      (1) Two (2) extrusion laminators;                      (2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour;                      (3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.</p> <p>(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 104 (10RL), approved in 2022 for construction, having a maximum line speed of 1312 ft/min and a maximum printing width of 52 inches, using thermal oxidizer Megtec as control, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack S13. Equipped with adhesive applicator and enclosed in a permanent total enclosure.</p> <p>(f) One (1) 7L laminator, identified as EU 205, approved in 2022 for construction, using Megtec thermal oxidizer as control when using solvent borne coatings, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack S13. When coating using water-based coatings, the thermal oxidizer will not be operated, and emissions will be exhausted through stack 14. Product being coated is web substrate packaging material, application method used is roll coating, and consisting of the following units:</p>

PERMIT SECTION D.1		
(1) Two (2) extrusion laminators (2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent enclosure capture system, each coating a maximum of 43.1 million (MM) square inches per hour; (3) One (1) 8.0 MMBtu/hr hot oil system  (g) One (1) cold cleaner degreasing unit, identified as EU 102, constructed in 1987 and approved in 2019 for modification, using a distillation unit and the 6RL or 8RL thermal oxidizer as control, and exhausting to stack S11 or stack 13.  (h) One (1) cold cleaner degreasing unit, identified as EU 105, constructed in 1995, using a distillation unit and the 6RL or 8RL thermal oxidizer as control, and exhausting to stack S11 or stack 13.  (k) One (1) 11-head inkjet printer, identified as Inkjet Printer to print promotional codes, permitted in 2021, with a maximum of ink material usage of 0.94 liters per day per head, using no control, and exhausting indoors.  (l) One (1) 2-head inkjet printer, identified as QR Printer to print QR codes, permitted in 2021, with a maximum of ink material usage of 2.64 liters per day per head, using no control, and exhausting indoors.		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> <li>• 326 IAC 8-1-2, 8-1-4, 8-1-12, 8-2-5, 8-3-2, 8-3-8, &amp; 8-5-5</li> </ul>		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements – 5/24/2022 (8RL), 7/8/2022 (6RL) & 11/14/2023 (6X)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: VOC content and emissions Solvent use RTO temperature Duct pressure/fan amperage Gauge Calibration		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
According to Mr. Wall, Sonoco operated normally during the inspection. I observed no indication of visible emissions. I perused the PMP and determined its adequacy. For PSD avoidance, Sonoco's VOC emissions may not exceed 246.3 tons per twelve consecutive months. A records review and quarterly reports indicate compliance with the VOC limit. Sonoco emitted 73.94 tons of VOCs. For PSD BACT, a permanent total enclosure contains the presses. The room enclosure uses automatic doors for forklift ingress and egress that close as soon as a forklift enters and exits the enclosure. However, one automatic door for 6RL was malfunctioning during the inspection, so Sonoco employees manually opened and closed the doors. I cautioned Mr. Wall to ensure the employees continue their due diligence in maintaining a total enclosure while the automatic door malfunctioned. Stack test results indicate compliance with capture efficiency and destruction efficiency requirements. Sonoco complies with the VOC input to the 5X extrusion coater/laminator of 25 tons per twelve consecutive month period. The VOC input for unit 102 is limited to less than 16.43 tons per 12 consecutive month period. The source emitted 9.95 tons.		

**PERMIT SECTION D.1**

The VOC input to 5X is limited to less than 25 tons per 12 consecutive month period. The source emitted 0 tons as it has not operated in a few years. The unit is operational, but Sonoco does not use it due to a lack of business for the machine. Mr. Wall said the source is hopeful of securing a contract that will bring 5X back to production. Unit 8RL is used only sporadically. In fact, Sonoco plans to begin dismantling 8RL by the end of this calendar year. The press will be replaced by the new units 10RL (called R17 at the source) and 7L (called L25 at the source). Both of those units began operations in March of 2024. However, current production is occasional with hopes of ramping up production soon. I discussed the required stack testing of the new units due within 180 days. I reminded Mr. Wall that the stack test clock is ticking, and he said Sonoco has tentatively scheduled said test within the 180-day window. Work practices such as keeping cleaning materials in closed containers or in pipes are maintained as required. Sonoco has equipped the degreasers with covers which were closed during the inspection; provides permanent, conspicuously posted operating instructions; and stores waste solvents only in closed containers. The VOC composite partial vapor pressure does not exceed the 326 IAC 8-3-8 limit of 1 mm of mercury at 20° C. Sonoco's solvent has a partial vapor pressure of 0.7 mm Hg. Sonoco maintains maintenance logs for each coating facility. The source calibrates and operates a continuous monitoring system for 6RL, 8RL, and 10 RL (R17) thermal oxidizers and records the 3-hour temperature readings from said oxidizers. The minimum temperature for the 6RL thermal oxidizer, according to the most recent stack test which occurred on 11/14/2023, is 1550° F. The temperature during the inspection was 1634°F. The minimum oxidizer temperature for 8RL is 1593°F, and the reading during the inspection was 1600°F. The duct pressure range for both oxidizers is -2.6 inches to -2.7 inches. Press 6RL operated at -2.6 inches, whereas 8RL operated at -2.7 inches. Sonoco provided documentation showing that calibration of the gauges used to measure duct pressure is only necessary once every four years. However, the source performs gauge calibration once every two years. Since permit condition D.1.17 (d) specifically states, "The instruments used for determining the pressure drop. . . shall be calibrated or replaced at least once every six (6) months or as per manufacturer's recommendation," Sonoco complies by calibrating the gauges more often than the manufacturer's recommendation.

<i>Emission Unit Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
Thermal oxidizer – 6RL	3-hour temperature range	Minimum 1607° F	1634°F
Thermal oxidizer – 8RL	3-hour temperature range	Minimum 1583° F	1600°F
Thermal oxidizer - 6RL	Duct pressure	-2.6 - -2.7 inches	-2.6 inches
Thermal oxidizer - 8RL	Duct pressure	-2.6 - -2.7 inches	-2.7 inches
Presses 6RL and 8RL	Total room enclosure – negative pressure	All doors closed	Closed with negative pressure

**Permit Section Compliance Status:**

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

**PERMIT SECTION D.2**

**Emission Units and Control Devices:**

One (1) natural gas boiler, identified as Boiler EU 11 (No. 1), constructed in 1997, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 01.

One (1) natural gas boiler, identified as Boiler EU 12 (No. 2), constructed in 1998, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 02.

**Pollutants with Emission Limits or Applicable Standards:**

- SO<sub>2</sub>  NO<sub>x</sub>  CO  VOC  PM  PM<sub>10</sub>  PM<sub>2.5</sub>  HAPS

**Applicable Rules:**

- 326 IAC 6-2-4

<b>PERMIT SECTION D.2</b>			
<u>Requirement:</u>		<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations and Standards		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Testing Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Reporting Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Observations and Comments:</b>			
One of the two boilers operated during the inspection. I observed no visible emissions. I perused the PMP and deemed the plan as adequate.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
<b>Permit Section Compliance Status:</b>			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

<b>PERMIT SECTION E.1</b>			
<u>Emission Units and Control Devices:</u>			
One (1) natural gas boiler, identified as Boiler EU 11 (No. 1), constructed in 1997, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 01			
One (1) natural gas boiler, identified as Boiler EU 12 (No. 2), constructed in 1998, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 02			
<u>Pollutants with Emission Limits or Applicable Standards:</u>			
<input type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS			
<u>Applicable Rule:</u>			
40 CFR 60 – Subpart Dc			
<u>Applicability Information:</u>			
Steam generating unit built after 6/9/1989 with a maximum design heat input capacity of 100 MMBtu/hr or less but greater than 10 MMBtu/hr.			
<u>Requirement:</u>		<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations/Standards		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Work Practice/Operating Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Record Keeping Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Excess emissions Opacity during the stack test			
Reporting Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Observations and Comments:</b>			

PERMIT SECTION E.1			
During the inspection, I observed no visible emissions. Sonoco maintains excess emissions records for any excess emissions period that occurs. None occurred since the most recent inspection. The source keeps records of opacity taken during performance tests and during any excess emissions.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.2			
Emission Units and Control Devices:			
One (1) natural gas boiler, identified as Boiler EU 11 (No. 1), constructed in 1997, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 01.  One (1) natural gas boiler, identified as Boiler EU 12 (No. 2), constructed in 1998, with a heat input capacity of 20.925 MMBtu/hr, and exhausting to stack 02.			
Pollutants with Emission Limits or Applicable Standards:			
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS			
Applicable Rule:			
40 CFR 63, Subpart DDDDD			
Applicability Information:			
An industrial boiler that is part of a major source of HAPs			
Requirement:	Applicable	Violation Noted	
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Types of Records Reviewed: Work practice standards Boiler tune ups Visible inspections Operating & maintenance procedures			
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Observations and Comments:			
During the inspection, I observed no visible emissions. Sonoco has implemented work practice standards and has performed the boiler tune ups once every five years. The source conducted a one-time energy assessment. Sonoco visually inspects the units, and operation and maintenance records are maintained as required.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
Permit Section Compliance Status:			



PERMIT SECTION E.2
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.3		
Emission Units and Control Devices:		
<p>(a) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:                      (1) One (1) extrusion laminator                      (2) One (1) coating/adhesive lamination deck                      (3) One (1) coating deck                      (4) Two (2) coating station dryers</p> <p>(b.1) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), constructed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, using thermal oxidizer Megtec as control, using natural gas, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack 13. Equipped with adhesive applicator and enclosed in a permanent total enclosure.</p> <p>One (1) 7L laminator, identified as EU 205, approved in 2022 for construction, using Megtec thermal oxidizer as control when using solvent borne coatings, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack S13. When coating using water-based coatings, the thermal oxidizer will not be operated, and emissions will be exhausted through stack 14. Product being coated is web substrate packaging material, application method used is roll coating, and consisting of the following units:                      (1) Two (2) extrusion laminators                      (2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent enclosure capture system, each coating a maximum of 43.1 million (MM) square inches per hour;                      (3) One (1) 8.0 MMBtu/hr hot oil system</p>		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 63, Subpart JJJJ		
Applicability Information:		
A facility that is a major source of HAPs		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Temperature – 3-hr average Duct Pressure		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Observations and Comments:		



PERMIT SECTION E.3			
Sonoco uses a thermal oxidizer to comply with this rule. Three-hour average temperature readings are maintained and monitored on a data logger. Capture, control, and destruction are used to eliminate HAP emissions. Stack testing demonstrated a 99% overall control efficiency and a 99% destruction efficiency. Sonoco meets the emissions limit of no more than 5% of the organic HAP applied each month (95% reduction) at an existing affected source.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Please see section D.1			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.4		
Emission Units and Control Devices:		
One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), constructed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, using thermal oxidizer 6RL as control, using natural gas, with a heat input rate of 24.0 MMBtu/hr, and exhausting to stack S11. Equipped with adhesive applicator and enclosed in a permanent total enclosure.		
One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), constructed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, using thermal oxidizer 8RL as control, using natural gas, with a heat input rate of 8.7 MMBtu/hr, and exhausting to stack 13. Equipped with adhesive applicator and enclosed in a permanent total enclosure.		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 63, Subpart KK		
Applicability Information:		
Operating rotogravure presses at a major source of HAPs		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Continuous emissions monitoring Liquid-liquid material balances HAP information and emissions calculations Total mass and organic HAP content of each material applied on product or through the presses		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Observations and Comments:		

PERMIT SECTION E.4			
Sonoco maintains records of the total mass of each material applied on product and packaging presses each month. Source has not exceeded 500 kg per month (1102 pounds) of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials on product and packaging rotogravure or wide-web flexographic printing presses. Sonoco operates in a manner consistent with safety and good air pollution control practices for minimizing emissions.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Please see condition D.1			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input checked="" type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Annual Notification(s)	<input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Additional Information and Comments:	
Additional Source Compliance Review Status:	
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:	

INSPECTION FINDINGS	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mr. Wall prior to exiting the facility. Moreover, I shared my findings with Mr. Leuck via phone after the inspection.