

From: [Michael M. Wiczorek](#)
To: [Moulik, Pratim](#)
Cc: debbie.roederer@graphicpkg.com
Subject: RE: Applicant Review for MSOP AA No. 043-47916-00076 for Graphic Packaging International, LLC
Date: Tuesday, June 25, 2024 9:48:28 AM
Attachments: [image010.png](#)
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**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Pratim,

Thanks for your work on the permit and the opportunity to review.

Please see the attached documents:

- In the .doc files, we've provided comments in track changes
- In the .xls file, we've inserted comments called out with yellow highlighting. During review I also did some minor formatting (table borders and column sizing), but nothing to impact the technical content of the file.

If you'd like to discuss any of our comments, please don't hesitate to reach out.

Regards,
Mike

Michael Wiczorek

Senior Managing Consultant
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From: Moulik, Pratim <PMoulik@idem.IN.gov>
Sent: Wednesday, June 19, 2024 12:18 PM
To: Michael M. Wiczorek <mwiczorek@ramboll.com>
Cc: debbie.roederer@graphicpkg.com
Subject: Applicant Review for MSOP AA No. 043-47916-00076 for Graphic Packaging International, LLC

Dear Mike Wiczorek/Debbie Roederer:

Attached please find the draft MSOP AA and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for MSOP AA permit No.: 043-47916-00076 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one (1) week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 26, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	MSOP Administrative Amendment
-----	-------------------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

 |  |  |  |  | www.idem.IN.gov

Scan the QR code to leave your feedback.

We appreciate your input!





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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**Graphic Packaging International, LLC
2549 Charlestown Road
New Albany, Indiana 47150**

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

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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M043-45765-00076 Master Agency Interest ID: 30933	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:
Administrative Amendment No.: 043-47916-00076	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 9, 2027

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY4

- A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
- A.2 Source Definition [326 IAC 2-7-1(22)]
- A.3 Emission Units and Pollution Control Equipment Summary

SECTION B GENERAL CONDITIONS6

- B.1 Definitions [326 IAC 2-1.1-1]
- B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability
- B.5 Severability
- B.6 Property Rights or Exclusive Privilege
- B.7 Duty to Provide Information
- B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
- B.12 Permit Renewal [326 IAC 2-6.1-7]
- B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
- B.14 Source Modification Requirement
- B.15 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 13-17-3-2][IC 13-30-3-1]
- B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
- B.17 Annual Fee Payment [326 IAC 2-1.1-7]
- B.18 Credible Evidence [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS11

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]11

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Permit Revocation [326 IAC 2-1.1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-6.1-5(a)(2)]13

- C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]13

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]13

- C.10 Compliance Monitoring [326 IAC 2-1.1-11]
- C.11 Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps14

- C.12 Response to Excursions or Exceedances
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]15

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 Emission Statement [326 IAC 2-6]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]17
D.1.1 VOC BACT Avoidance Limit [326 IAC 8-1-6]
D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]17
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]18
D.1.4 Record Keeping Requirement
D.1.5 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS19

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]19
D.2.1 Volatile Organic Compounds (VOC) Limitations for Graphic Art Operations [326 IAC 8-5-5]
D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]20
D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]20
D.2.4 Record Keeping Requirements

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS21

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]21
D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]
D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]22
D.3.4 Record Keeping Requirements

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS23

Emission Limitations and Standards [326 IAC 2-8-4(1)]23
D.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS24

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]24
D.5.1 Particulate Matter Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]

ANNUAL NOTIFICATION25

MSOP Quarterly Report26

MSOP Quarterly Report27

MALFUNCTION REPORT28

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and 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 commercial printing operation.

Source Address:	2549 Charlestown Road, New Albany, Indiana 47150
General Source Phone Number:	812-941-3024/812-949-4393
SIC Code:	2752 (Commercial Printing, Lithographic)
County Location:	Floyd
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7-1(22)]

This source consists of the following two plants:

- (a) The Beeler Street plant, source ID 043-00057, located at 1502 Beeler St., New Albany, IN 47150; and
- (b) The Charlestown Road plant, source ID 043-00076, located at 2549 Charlestown Road, New Albany, IN 47150.

Graphic Packaging International, LLC owns and operates both plants. The Beeler Street plant sends printed cartons to the Charlestown Road plant for finishing and gluing. IDEM, OAQ has examined whether the two plants are part of the same major source.

IDEM, OAQ will issue administratively separate permits to the sources that reflect that the two sources are part of the same major source. Source determination was established in Permit No. F043-39757-00076, issued on June 26, 2018, and F043-39590-00057, issued on June 27, 2018.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.
- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.

- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors.
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors.
- (h) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (i) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors.
- (j) One (1) Parts Washer (MS) identified as P6, with a maximum usage rate of 432 gallons per year.
- (k) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.
- (l) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.
- (m) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour.
- (n) One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.
- (o) One (1) Plate Making Operation, identified as P90, constructed in 2022.
- (p) Fugitive dust; paved roads and parking lots [40 IAC 326 6-4]

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M043-45765-00076, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) 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 on or before the date it is due.

B.9 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) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M043-45765-00076 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 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 13-17-3-2][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, 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 the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempted 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, 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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and 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 emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (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.15 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

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

C.16 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Commented [MMW1]: Please confirm that, even though P40 Heidelberg Press will operate at the Charlestown Rd facility, the unit does not need to be listed here because it has no applicable requirements.

Emissions Unit Description:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 VOC BACT Avoidance Limit [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and in order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the followings:

The VOC emissions from the two (2) Mitsubishi Litho Presses - 57 inch (7 color and coating), identified as (PMIT-2 and PMIT-1) shall not exceed 21.38 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the two (2) Mitsubishi Litho Presses - 57-inch (7 color and coating), identified as (PMIT-2 and PMIT-1) to less than twenty-five (25) tons per year, each, and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to these units.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.1. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

Compliance with the limit in Condition D.1.1 shall be calculated by using the following formula for each press:

$$\text{VOC emissions (tons per year)} = \sum_{i=1}^n (U_i \times C_i) \times 1/2000 \text{ (lb/ton)} \times (1-R_f)$$

Where:

- U_i = ink, coating, fountain solution and/or wash usage in lb/yr
- C_i = ink, coating, fountain solution and/or wash VOC content %
- R_f = Retention factor

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The amount of raw material used on a monthly basis. Records shall include raw material usages and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month.
 - (3) The weight of VOC emitted for each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly summary of the information necessary to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C-General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors,
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors,

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) Limitations for Graphic Art Operations [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(c) (Graphic Art Operations), the Permittee shall not cause, allow, or permit the operation of the flexographic printing lines, identified as IFP-1, IFP-2, IFP-3, IFP-4, IFP-5, and IFP-6, unless:
 - (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
 - (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
 - (c) for flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.
- (b) Pursuant to 326 IAC 8-5-5(f) (Graphic Art Operations), work practices shall be used to minimize VOC emissions from cleaning operations. Work practices shall include, but not be limited to, the following:
 - (1) When not in use, all cleaning materials shall be kept in closed containers.
 - (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and solids content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) One (1) Parts Washer (MS), identified as P6, with a maximum usage rate of 432 gallons per year.
- (k) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.

- (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.3. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:

- (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (i) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors

(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.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from Balers 1-3 (P5) shall not exceed 19.81 pounds per hour when operating at a process weight rate of 10.5 tons per hour. The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from Baler 4 (P7) shall not exceed 15.8 pounds per hour when operating at a process weight rate of 7.5 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.4. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (I) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.5.1 Particulate Matter Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions from MSK Pallet Bagger - Shrink Wrap Heater (CU-24) shall be limited to 0.6 pounds per MMBtu heat input.

D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.5. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
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). The initial notification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent notifications shall cover the time period from January 1 to December 31 of the previous year.

Company Name:	Graphic Packaging International, LLC
Source Address:	2549 Charlestown Road
City:	New Albany, Indiana 47150
Phone #:	812-941-3024 812-949-4393
MSOP #:	M043-45765-00076

I hereby certify that Graphic Packaging International, LLC is: still in operation.
 no longer in operation.
I hereby certify that Graphic Packaging International, LLC is: in compliance with the requirements of MSOP M043-45765-00076.
 not in compliance with the requirements of MSOP M043-45765-00076.

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:

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

MSOP Quarterly Report

Source Name: Graphic Packaging International, LLC
Source Address: 2549 Charlestown Road, New Albany, IN 47150
MSOP Permit No.: M043-45765-00076
Facility: Mitsubishi Litho Press - 57 inch (7 color and coating), identified as PMIT-2
Parameter: The VOC emissions
Limit: shall not exceed 21.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

MSOP Quarterly Report

Source Name: Graphic Packaging International, LLC
Source Address: 2549 Charlestown Road, New Albany, IN 47150
MSOP Permit No.: M043-45765-00076
Facility: Mitsubishi Litho Press - 57 inch (7 color and coating), identified as PMIT-1
Parameter: The VOC emissions
Limit: shall not exceed 21.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

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

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Appendix A: Emissions Calculations
Emissions Summary

Source Name: Graphic Packaging International, LLC
 Source Location: 2549 Charlestown Road, New Albany, IN 47150
 1502 Beeler Street, New Albany, IN 47150
 Permit No.: 043-47916-00076
 Permit Reviewer: Pratim Mouluk

Emission Source	Uncontrolled Potential to Emit (tpy)								
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Single HAP*	Total HAP
Beeler Street Total	0.11	0.16	0.15	0.01	1.94	6.14	1.63	0.00	1.57
Charlestown Road Total	10.31	2.58	0.42	0.01	1.84	89.83	1.55	2.31	6.11
Annual Total	10.42	2.74	0.57	0.02	3.79	95.97	3.18	2.31	7.68

* Single Highest HAP = glycol ethers

Emission Unit	Emission Unit Description	PM		PM10		PM2.5		CO		NOx		SOx		VOC		Limited VOC
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
Beeler Street																
CU-1, CU-2, CU-3	Combustion Sources	0.01	0.04	0.03	0.15	0.03	0.15	0.37	1.63	0.44	1.94	0.003	0.01	0.02	0.11	0.11
P70	Basement Coater	--	--	--	--	--	--	--	--	--	--	--	--	1.04	4.55	4.55
P80	Parts Washer (VMW)	--	--	--	--	--	--	--	--	--	--	--	--	0.34	1.48	1.48
-	Paved Road Mitigated Fugitives	0.02	0.07	0.00	0.01	0.00	0.003	--	--	--	--	--	--	-	-	-
														6.14	6.14	
Charlestown Road																
CU-4 through CU-24	Combustion Sources	0.01	0.04	0.03	0.14	0.03	0.14	0.35	1.55	0.42	1.84	0.003	0.01	0.02	0.10	0.10
PMIT-2	Mitsubishi Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	11.2	30.29	21.38
PMIT-1	Mitsubishi Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	11.2	30.29	21.38
P40	Heidelberg Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	7.8	21.18	21.18
IFP-1	Inline Flexo Press 1	--	--	--	--	--	--	--	--	--	--	--	--	0.08	0.35	0.35
IFP-2	Inline Flexo Press 2	--	--	--	--	--	--	--	--	--	--	--	--	0.06	0.28	0.28
IFP-3	Inline Flexo Press 3	--	--	--	--	--	--	--	--	--	--	--	--	0.08	0.35	0.35
IFP-4	Inline Flexo Press 4	--	--	--	--	--	--	--	--	--	--	--	--	0.32	1.38	1.38
IFP-5	Inline Flexo Press 5	--	--	--	--	--	--	--	--	--	--	--	--	0.32	1.38	1.38
IFP-6	Inline Flexo Press 6	--	--	--	--	--	--	--	--	--	--	--	--	0.53	2.31	2.31
P5	Balers 1-3	1.01	4.44	0.25	1.11	0.02	0.09	--	--	--	--	--	--	--	--	--
P6	Parts Washer	--	--	--	--	--	--	--	--	--	--	--	--	0.34	1.48	1.48
P7	Baler 4	0.72	3.17	0.18	0.79	0.01	0.06	--	--	--	--	--	--	--	--	0.00
P8	Parts Washer	--	--	--	--	--	--	--	--	--	--	--	--	0.09	0.38	0.38
P90	Plate Making	--	--	--	--	--	--	--	--	--	--	--	--	0.01	0.06	0.06
-	Paved Road Mitigated Fugitives	0.61	2.66	0.12	0.53	0.03	0.13	--	--	--	--	--	--	--	--	--
														89.83	72.01	
														95.97	78.15	

Emission Source	Potential to Emit after Issuance (tpy)								
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Single HAP*	Total HAP
Beeler Street Total	0.11	0.16	0.15	0.01	1.94	6.14	1.63	0.00	1.57
Charlestown Road Total	10.31	2.58	0.42	0.01	1.84	72.01	1.55	2.31	6.11
Annual Total	10.42	2.74	0.57	0.02	3.79	78.15	3.18	2.31	7.68

* Single Highest HAP = glycol ethers

Appendix A: Emissions Calculations
HAP Potential Emissions

Source Name: Graphic Packaging International, LLC
 Source Location: 2549 Charlestown Road, New Albany, IN 47150
 1502 Beeler Street, New Albany, IN 47150
 Permit No.: 043-47916-00076
 Permit Reviewer: Pratim Moulitk

Emission Point	Emissions (t/yr)	
	Single HAP (Glycol Ethers)	Total HAP
Beeler Street Total	0.00	1.57
Charlestown Road Total	2.31	6.11
Annual Total	2.31	7.68

*Single largest HAP is Glycol Ethers

Emission Unit	Emission Unit Description	HAP Emissions (t/yr)											HAP Emissions (t/yr)												
		Total HAP	Acetaldehyde	Benzene	Cadmium Compounds	Chromium Compounds	Cumene	Dichlorobenzene	Ethyl Acrylate	Ethyl Benzene	Ethylene Glycol	Formaldehyde	Glycol Ethers	Hexane	Hydroquinone	Lead Compounds	Manganese Compounds	Methanol	Naphthalene	Nickel Compounds	Toluene	Triethylamine	Vinyl Acetate	Xylenes (mixed isomers)	
Beeler Street																									
CU-1, CU-2, CU-3	Combustion Sources	0.04	--	0.00004	0.00002	0.00003	--	0.00002	--	--	--	--	0.03	--	0.00001	0.00001	--	--	0.00004	0.0001	--	--	--	--	--
P70	Basement Cooler	1.52	0.30	--	--	--	--	0.30	--	--	--	--	--	--	--	--	0.30	--	--	--	--	--	0.30	--	--
P80	Parts Washer (VMW)	0.0139	--	--	--	--	0.0041	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.0026
Charlestown Road																									
CU-4 through CU-24	Combustion Sources	0.03	--	0.00004	0.00002	0.00003	--	0.00002	--	--	--	--	0.01	--	0.00001	0.00001	--	--	0.00004	0.00006	--	--	--	--	--
PMT-2	Mitsubishi Litho Press	2.25	--	0.002	--	--	0.012	--	--	0.002	--	--	0.8	--	0.85	0.01	0.07	--	0.4	0.002	--	--	0.002	--	0.1
PMT-1	Mitsubishi Litho Press	2.25	--	0.002	--	--	0.012	--	--	0.002	--	--	0.8	--	0.85	0.01	0.07	--	0.4	0.002	--	--	0.002	--	0.1
P40	Haidelberg Litho Press	1.57	--	1.49E-03	--	--	0.01	--	--	1.09E-03	--	--	0.56	--	0.50	0.01	0.05	--	0.30	1.49E-03	--	--	1.49E-03	--	0.04
P6	Parts Washer (VMW)	0.01	--	--	--	--	0.0041	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.0099
Total																									
		0.30	0.006	0.00004	0.00005	0.04	0.00005	0.30	0.006	2.16	0.01	2.31	0.10	0.18	0.00002	0.00002	1.46	0.006	0.00	0.006	0	0.00	0.30	0.18	

**Appendix A: Emissions Calculation
Modification**

**Source Name: Graphic Packa
Source Location: 2549 Charlest
1502 Beeler St
Permit No.: 043-47916-000**

Uncontrolled Potential to Emit of Modified Un					
Emission Unit		PM	PM ₁₀	PM _{2.5} *	SO ₂
PMIT-2	Before	0	0	0	0
PMIT-2	After	0	0	0	0
<i>PTE Increase</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
PMIT-1	Before	0	0	0	0
PMIT-1	After	0	0	0	0
<i>PTE Increase</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
P40	Before	0	0	0	0
P40	After	0	0	0	0
<i>PTE Increase</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
Total PTE Increase (tons/year):		0	0	0	0

**PM_{2.5} listed is direct PM_{2.5}*

ns

aging International, LLC
own Road, New Albany, IN 47150
treet, New Albany, IN 47150
176

its (tons/year)				
NO _x	VOC	CO	Combined HAPs	Single HAP (Glycol Ethers)
0	29.62	0	2.16	0.85
0	30.29	0	2.25	0.85
0	0.67	0	0.09	0.00
0	29.62	0	2.16	0.85
0	30.29	0	2.25	0.85
0	0.67	0	0.09	0.00
0	17.30	0	0.10	0.00
0	21.18	0	1.57	0.60
0	3.88	0	1.47	0.60
0	5.22	0	1.64	0.60

**Appendix A: Emissions Calculations
Potential Emission Calculations
Lithographic Printing/In-Line Coating VOC**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulk

Source ID	Emission Unit	Maximum Sheet Processing Rate ¹	Maximum Sheet Area	Potential Annual Hours of Printing and/or Coating ²	Maximum Sheet Processing Rate	Type of Material Applied or Used	Maximum Sheet Coverage ³	Material Usage Factor ⁴	Units	Maximum Material Usage Rate		Material VOC Content ⁵	Mass of VOC Applied to Sheet		Potential VOC Emission Rate ^{6,7}		
		(sheet/hr)	(ft ² /sheet)		(MMsheet/yr)					(lb/hr)	(lb/yr)	(wt%)	(lb/hr)	(lb/yr)	(lb/hr)	(tpy)	
Beeler Street																	
P70	Basement Coater (coating only)	2,000	7.60	8,760	18	Lithographic Ink					Not applied						
						Lithographic Coating	100%	0.0046	lb/ft ² print area	69.29	606,943	1.50%	1.04	9,104	1.04	4.55	
						Fountain Solution				Not applied							
						Wash Materials				N/A, only water is used for cleaning							
														P70 Total =		1.04	4.55
Charlestown Road																	
P40	Heidelberg Litho Press - 40 inch (7 color and coating)	15,000	7.89	7,884	118	Lithographic Ink	100%	0.0002	lb/ft ² print area	23.69	186,788	13.00%	3.08	24,282	0.15	0.61	
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	71.01	559,804	4.57%	3.24	25,583	3.24	12.79	
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	4.74	37,358	33.67%	1.60	12,578	1.60	6.29	
				1,051		Wash Materials	--	0.12	lb/lb ink applied	2.84	2,989	100.00%	2.84	2,989	2.84	1.49	
														P40 Total =		7.8	21.2
PMIT-2	Mitsubishi Litho Press - 57 inch (7 color and coating)	10,500	16.12	7,884	83	Lithographic Ink	100%	0.0002	lb/ft ² print area	33.88	267,111	13.00%	4.40	34,724	0.22	0.87	
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	101.54	800,533	4.57%	4.64	36,584	4.64	18.29	
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	6.78	53,422	33.67%	2.28	17,987	2.28	8.99	
				1,051		Wash Materials	--	0.12	lb/lb ink applied	4.07	4,274	100.00%	4.07	4,274	4.07	2.14	
														PMIT-2 Total =		11.2	30.3
PMIT-1	Mitsubishi Litho Press - 57 inch (7 color and coating)	10,500	16.12	7,884	83	Lithographic Ink	100%	0.0002	lb/ft ² print area	33.88	267,111	13.00%	4.40	34,724	0.22	0.87	
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	101.54	800,533	4.57%	4.64	36,584	4.64	18.29	
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	6.78	53,422	33.67%	2.28	17,987	2.28	8.99	
				1,051		Wash Materials	--	0.12	lb/lb ink applied	4.07	4,274	100.00%	4.07	4,274	4.07	2.14	
														PMIT-1 Total =		11.2	30.3
														Total Lithographic Printing VOCs (tons/yr) =		86.3	

Notes:

- ¹ Machine capacity (sheets/hr) is used to develop hourly emission estimates. Unless otherwise stated, annual emissions assume continuous operation throughout the year.
- ² Press potential operating times assume that over the course of a year, each press experiences 25% makeready time with a 20% safety factor. Washes between press runs are estimated to be 10% of the time with a 20% safety factor.
8760 hours x (1-25%) x 1.2 = 7,884 hours printing time
8760 hours x (10%) x 1.2 = 1,051 hours press wash time
- ³ Maximum sheet coverage assumes coating/printing over the entire sheet.
- ⁴ Material usage factors derived from historic operating data from the sheetfed offset lithographic printing operations at similar GPI facilities.
- ⁵ Ink and coating are not thinned, so material VOC content equals as-applied VOC content. Fountain solution concentrate is diluted with water before use. Values shown are based on consumption of fountain solution concentrate.
- ⁶ VOC emissions estimated by applying material VOC content to usage rate. According to EPA-453/R-06-002 (September 2006), ink VOC emissions apply retention factor of: 95%
- ⁷ Blanket/roller wash emissions conservatively do not apply a retention factor to account for material retained in shop towels used for press washing operations.

Equations:

- 1) Maximum material usage rate (ink or coating) (lb/hr) = Maximum Sheet Area (ft²/sheet) x Sheet Processing Rate (sheet/hr) x Material Usage Factor (lb/ft²)
- 2) Maximum material usage rate (fountain solution or wash material) (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor (lb/lb ink)
- 3) Mass of VOC Applied to Sheet (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)
- 4) VOC Emission Rate (inks) (lb/hr) = Mass of VOC applied to sheet (lb/hr) x (1 - 95% retention factor)
- 5) VOC Emission Rate (coating, fountain solution, wash material) (lb/hr) = Mass of VOC applied to sheet (lb/hr)

Appendix A: Emissions Calculations
Potential Emission Calculation
Lithographic Printing (In-Line Coating HAP)
Source Name: Graphic Packaging International, LLC
Source Location: 2500 Chubbuck Road, New Albany, IN 47150
Form # 906-001-0001
Form Date: 04/25/2009
Form Revision: 1
Printed Date: 10/20/2009

Table with columns for Source ID, Emission Unit, Type of Material Applied or Used, Material Name, Usage Rate, Volatile Content, Solvent Content, Coating Content, Ethyl Acrylate Content, Ethyl Benzene Content, Styrene Glycol Content, Formaldehyde Content, Glycol Ethers, Hexane, Hydrocarbons Content, Nitrogen Content, Chlorine Content, Phthalates Content, Total Acetone Content, Total Toluene Content, Potential HAP Emission Rate, and various HAP emission categories (Acetaldehyde, Benzene, Cumene, Ethyl Acrylate, Ethyl Benzene, Ethylene Glycol, Formaldehyde, Glycol Ethers, Hexane, Hydrocarbons, Methanol, Naphthalene, Toluene, Triethylamine, Vinyl Acetate, Xylene).

Notes: 1 Calculated on the "LHNO VOC" tab.
2 HAP wt% used is the average HAP from the SDS.

**Appendix A: Emissions Calculations
Potential VOC Emission Calculation
Charlestown Facility Only
Flexographic Printing**

**Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik**

	Max Operating Hours ¹ (hr/yr)	Web Width ² (ft)	Maximum Press Speed (ft/min)	Web Rate ³ (ft ² /hr)	Number of Print Stations	Press-ready Ink Application Rate ⁴ (lb/ft ²)
Charlestown Rd (Flexographic printing operations are not located at Beeler St facility)						
Inline Flexo Press 1	8,760	3.67	450	99,000	1	0.000042
Inline Flexo Press 2	8,760	3.00	450	81,000	1	0.000042
Inline Flexo Press 3	8,760	3.67	450	99,000	1	0.000042
Inline Flexo Press 4	8,760	3.67	450	99,000	4	0.000168
Inline Flexo Press 5	8,760	3.67	450	99,000	4	0.000168
Inline Flexo Press 6	8,760	4.58	800	220,000	3	0.000126

	Max Operating Hours (hr/yr)	VOC Wt%	Maximum Material Usage (lb/hr)	Material Usage (lbs/yr)	Potential VOC Emissions	
					(lb/hr)	(tpy)
Flexo Press 1 - Inks	8,760	1.84%	4.158	36,424	0.08	0.34
Fugitive Cleaning	8,760	0.50%	0.50	4,371	0.00	0.01
Press 1 Total =					0.08	0.35
Flexo Press 2 - Inks	8,760	1.84%	3.402	29,802	0.06	0.27
Fugitive Cleaning	8,760	0.50%	0.41	3,576	0.00	0.01
Press 2 Total =					0.06	0.28
Flexo Press 3 - Inks	8,760	1.84%	4.158	36,424	0.08	0.34
Fugitive Cleaning	8,760	0.50%	0.50	4,371	0.00	0.01
Press 3 Total =					0.08	0.35
Flexo Press 4 - Inks	8,760	1.84%	16.632	145,696	0.31	1.34
Fugitive Cleaning	8,760	0.50%	2.00	17,484	0.01	0.04
Press 4 Total =					0.32	1.38
Flexo Press 5 - Inks	8,760	1.84%	16.632	145,696	0.31	1.34
Fugitive Cleaning	8,760	0.50%	2.00	17,484	0.01	0.04
Press 5 Total =					0.32	1.38
Flexo Press 6 - Inks	8,760	1.84%	27.72	242,827	0.51	2.23
Fugitive Cleaning	8,760	0.50%	3.33	29,139	0.02	0.07
Press 6 Total =					0.53	2.31

Total Flexographic Printing VOCs (tons/yr) = 6.05

Flexo Inline Press Ink (lbs/ft²/station) = 0.000042

Notes:

- ¹ Based on operating 24 hrs/day, 365 days/yr without accounting for press make ready and press wash time.
- ² Inline Flexo Presses 1, 3, 4, and 5 have a maximum web width of 44"; Inline Flexo Press 2 has a max web width of 36"; Inline Flexo Press 6 has a max web width of 55".
- ³ Based on the maximum capacity of press.
- ⁴ Ink application rate (lb/ft²) is derived from recent operating data for the presses at this location adjusted for number of printing stations.

Equations:

- 1) Maximum ink usage rate (lb/hr) = Web Rate (ft²/hr) x Material Usage Factor (lb/ft²)
- 2) Maximum cleaner usage rate (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor (0.12 lb/lb ink)
- 3) VOC Emission Rate (ink and wash material) (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)

**Appendix A: Emissions Calculations
Potential Emission Calculation
Charlestown Facility Only
Scrap Processing**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulk

Emission Unit	Total Potential Max Feed Rate (ton scrap/hr)	Uncontrolled Emission Rate ¹ PM		Uncontrolled Emission Rate ¹ PM10		Uncontrolled Emission Rate ¹ PM2.5		Allowable Emission (326 IAC 6-3-2) (lb/hr)	Controlled Emission Rate ³ (Baghouse Outlet) PM		Controlled Emission Rate ³ (Baghouse Outlet) PM10		Controlled Emission Rate ³ (Baghouse Outlet) PM2.5	
		(lb/hr)	(tpy) ²	(lb/hr)	(tpy) ²	(lb/hr)	(tpy) ²		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Baler 1-3 (P5)	10.50	1.01	4.44	0.25	1.11	0.02	0.09	19.81	5.07E-03	2.22E-02	1.27E-03	5.56E-03	2.03E-04	8.89E-04
Baler 4 (P7)	7.50	0.72	3.17	0.18	0.79	0.01	0.06	15.82	3.62E-03	1.59E-02	9.06E-04	3.97E-03	1.45E-04	6.35E-04

The Baler System which makes up the Scrap Processing System at the Charlestown facility is a collection system that captures and routes trim scrap from the cutting operations and shredded board to the baler to be baled for recycling using a dedicated separator/cyclone unit. The cyclone is considered inherent process equipment. Baler system exhaust is then routed to a baghouse dust collector for particulate control before exhausting via stack inside the building.

Design Parameters for Baler Systems and Associated Baghouse (Dust Collector)			
Parameter	Value	Units	Basis
Maximum Operating Hours	8,760	hr/yr	Assumes continuous annual operation for the new Scrap System (e.g., 24 hrs/day, 365 days/yr).
Filterable PM Emission Factor	0.097	lb PM/ton scrap	Baler source test at GPI's Riverwood International facility (May 2000) plus a 25% safety margin.
Percent of Uncontrolled FPM ≤10 μm in diameter	25%	%	AP-42, Appendix B.2, Table B.2.2, Category 6 Process: Grain Handling Material: Grain Assumes all PM generated by the scrap waste system is filterable (negligible condensable PM generation).
Percent of Uncontrolled FPM ≤2.5 μm in diameter	2%	%	Conservatively used maximum values for the most similar process type. In addition, conservatively assumes that cumulative percentage is the maximum value plus the standard deviation.
Baghouse Control Efficiency, PM	99.5%	%	AP-42, Appendix B.2, Table B.2.3 for fabric filters.
Baghouse Control Efficiency, PM10	99.5%	%	
Baghouse Control Efficiency, PM2.5	99%	%	

Notes:

- ¹ Uncontrolled filterable PM emission rates are based on a stack test-derived emission factor for a similar facility. The uncontrolled emission rates for PM10 and PM2.5 were then calculated based on Appendix B.2, Table B.2.2, Category 6 particle size distribution.
- ² Annual emissions for all PM species are based on the maximum hourly PM emission rate.
- ³ Controlled emission rates of filterable PM, PM10, and PM2.5 were calculated by applying the appropriate control efficiencies from AP-42, Appendix B.2, Table B.2.3 for fabric filters.
- ⁴ There are nine Bobst, Platen type, cutters that feed the baler system at the Charlestown facility. The Beeler facility does not have a pneumatic scrap system in place for their five cutters and therefore cutting operations are not considered a source of emissions.

Equations:

- 1) Uncontrolled PM Emission Rate (lb/hr) = Maximum Feed Rate for Scrap (ton scrap/hr) x PM Emission Factor (lb PM/ton scrap)
- 2) Uncontrolled PM10 Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 10 μm in diameter
- 3) Uncontrolled PM2.5 Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 2.5 μm in diameter
- 4) Controlled PM Emission Rate (lb/hr) = Uncontrolled PM Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM)
- 5) Controlled PM10 Emission Rate (lb/hr) = Uncontrolled PM10 Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM10)
- 6) Controlled PM2.5 Emission Rate (lb/hr) = Uncontrolled PM2.5 Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM2.5)
- 7) Allowable Emissions (326 IAC 6-3-2) (lb/hr) = 4.1 * (Max throughput) (t/hr) ^0.67

**Appendix A: Emissions Calculations
Natural Gas Combustion**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik

Emission Unit ID	Combustion Source Description	Heat Input Capacity (MMBtu/hr)	Max Operating Hours (hr/yr)	Potential Throughput (MMCF/yr)
Beeler Street				
CU-1	Scotch Boiler	4.37	8,760	38
CU-2	Water Heater	0.08	8,760	0.6
CU-3	Office Furnace	0.08	8,760	0.6
Beeler Potential Throughput (MMCF/yr) =				38.8
Charlestown Road				
CU-4, CU-5, CU-6	Cambridge Units (3)	0.47	8,760	4.0
CU-7	Dayton 3e234d	0.25	8,760	2.1
CU-8	Airtemp 2524xc1451	0.19	8,760	1.6
CU-9	Lennox g51mp	0.10	8,760	0.9
CU-10	Dayton 3e133e	0.06	8,760	0.5
CU-11, CU-12, CU-13, CU-14	Dayton 3e132e (4)	0.12	8,760	1.0
CU-15	Dayton 3e233d	0.23	8,760	1.9
CU-16	Amana amh95	0.05	8,760	0.4
CU-17, CU-18	Dayton 3e404b	0.12	8,760	1.0
CU-19	Dayton 3e235d	0.30	8,760	2.6
CU-20	Lennox tga3005bh1g	0.48	8,760	4.1
CU-21	Carrier 48tcea06a1a6a0a0	0.12	8,760	1.0
CU-22	Carrier 48tced14a2g6a0a0a0	0.22	8,760	1.9
CU-23	Lennox 48tced24abt6a0f2a0	0.25	8,760	2.2
CU-24	MSK Pallet Bagger - Shrink Hood	1.34	8,760	11.5
Charlestown Potential Throughput (MMCF/yr) =				36.9

Total Potential Throughput (MMCF/yr) = 75.7

Pollutant	Emission Factor (lb/MMCF)	Beeler Potential Emission		Charlestown Potential Emission		Total Potential Emission	
		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Criteria Pollutants^{3,5}							
PM ¹	1.9	0.01	0.04	0.01	0.04	0.02	0.07
PM10	7.6	0.03	0.15	0.03	0.14	0.07	0.29
PM2.5	7.6	0.03	0.15	0.03	0.14	0.07	0.29
SO2	0.6	0.003	0.01	0.003	0.01	0.005	0.02
NOx ²	100	0.44	1.94	0.42	1.84	0.86	3.79
VOC	5.5	0.02	0.11	0.02	0.10	0.05	0.21
CO	84	0.37	1.63	0.35	1.55	0.73	3.18
HAPs^{3,4,5}							
Benzene	0.0021	0.00001	0.00004	0.00001	0.00004	0.00002	0.00008
Dichlorobenzene	0.0012	0.00001	0.00002	0.000005	0.00002	0.00001	0.00005
Formaldehyde	0.075	0.0003	0.001	0.0003	0.001	0.001	0.003
Hexane	1.8	0.01	0.03	0.01	0.03	0.02	0.07
Toluene	0.0034	0.00002	0.0001	0.00001	0.00006	0.00003	0.0001
Lead	0.0005	0.000002	0.00001	0.000002	0.00001	0.000004	0.00002
Cadmium	0.0011	0.000005	0.00002	0.000005	0.00002	0.000010	0.00004
Chromium	0.0014	0.00001	0.00003	0.000006	0.00003	0.00001	0.00005
Manganese	0.0004	0.000002	0.00001	0.000002	0.00001	0.000003	0.00002
Nickel	0.0021	0.00001	0.00004	0.000009	0.00004	0.00002	0.00008

Notes:

¹ PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

² Emission Factors for NOx: Uncontrolled = 100

³ All emission factors are based on normal firing.

⁴ The five highest organic and metal HAPs emission factors are provided above.

⁵ Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. Additional HAPs emission factors are available

Conversions:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Equations:

1) Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x Max Operating Hours (hr/yr) x 1 MMCF/1,020 MMBtu

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

3) Emission (lb/hr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / Max Operating Hours (hr/yr)

Methodology for HAPs is the same as VOCs

**Appendix A: Emissions Calculations
Parts Washers**

Source Name: Graphic Packaging International, LLC
 Source Location: 2549 Charlestown Road, New Albany, IN 47150
 1502 Beeler Street, New Albany, IN 47150
 Permit No.: 043-47916-00076
 Permit Reviewer: Pratim Moulik

Emission Unit	Maximum Usage Rate ¹ (gal/yr)	Density ² (lbs/gal)	VOC ² (wt%)	VOC ² (lb/gal)	Potential VOC Emissions ³	
					(lbs/hr)	(ton/yr)
Beeler Street						
Parts Washer P80 (VWM / Mirachem)	432	6.83	100%	6.83	0.34	1.48
Charlestown Road						
Parts Washer P6 (VWM / Mirachem)	432	6.83	100%	6.83	0.34	1.48
Parts Washer P8 (MS)	120	6.33	100%	6.33	0.09	0.38

Total VOC emissions = 0.76 3.33

Emission Unit	Maximum Usage Rate ¹ (gal/yr)	Density ² (lbs/gal)	Cumene (wt%)	Xylenes (wt%)	Cumene Emissions (tpy)	Xylenes Emissions (tpy)	Potential HAP Emissions		
							(lbs/hr)	(ton/yr)	
Beeler Street									
Parts Washer P80 (VWM / Mirachem)	432	6.83	0.55%	1.34%	0.0041	0.0099	0.003	0.014	
Charlestown Road									
Parts Washer P6 (VWM / Mirachem)	432	6.83	0.55%	1.34%	0.0041	0.0099	0.003	0.014	
Parts Washer P8 (MS)	120	6.33	N/A; no HAPs in Mineral Spirits						

Total HAP emissions = 0.006 0.028

Notes:

¹ Maximum usage of each parts washer is based on how often solvent is changed out in a year.

² Density and VOC wt% are taken from SDS information of VWM, a solvent previously used at GPI. Even though the Mirachem solvent (currently used) has no VOC content and the VMW solvent has a VOC content less than 100%, emission estimates conservatively assume 100% VOC wt%. HAP wt% used is from the VWM solvent.

³ Short-term emissions are calculated assuming maximum usage occurs over a typical work schedule:

8,760

Equations:

- 1) VOC (lbs/gallon) = Density (lbs/gal) x VOC (wt%)
- 2) Potential VOC Emissions (lbs/hr) = VOC (lbs/gallon) x Max. Usage Rate (gallons/yr) / Max Operating Hours (hr/yr)
- 3) Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs
 Methodology for HAPs is the same as VOCs

**Appendix A: Emissions Calculations
Plate Making (Charlestown Road Only)**

**Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik**

Material	Maximum Usage Rate ¹ (gal/yr)	Density (lbs/gal)	VOC (wt%)	VOC ² (lb/gal)	Potential VOC Emissions ^{3,4}		Emissions (lb/day) ⁴
					(lbs/hr)	(ton/yr)	
Charlestown Road (Plate Making was moved from Beeler to Charlestown)							
Plate developer	1,360	8.59	0%	0	0	0	0.34
Plate finisher	510	9.17	2.7%	0.24	0.01	0.06	
Replenisher	340	10.84	0%	0	0	0	

Total VOC emissions = 0.01 0.06

Notes:

¹ Maximum usage of each plate room material is scaled from past operating data, assuming that each press operates at its design capacity.

² VOC content and specific gravity are taken from MSDS information. Plate making materials currently in use do not contain HAPs.

³ Annual VOC emissions are calculated assuming that the entirety of volatile content is emitted during use.

⁴ Plate making qualifies as an insignificant activity under 326 IAC 2-7-1(42):

Emissions < 1.0 lb/day of each non-HAP regulated air pollutant;

Emissions < 1 lb/day of each HAP; and

Activity is not a process emission unit.

Equations:

1) VOC (lbs/gallon) = Density (lbs/gal) x VOC (wt%)

2) Potential VOC Emissions (lbs/hr) = VOC (lbs/gallon) x Max. Usage Rate (gallons/yr) / Max Operating Hours (hr/yr)

3) Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Paved Road Fugitive Emissions**

Source Name: **Graphic Packaging International, LLC**
 Source Location: **2549 Charlestown Road, New Albany, IN 47150**
1502 Beeler Street, New Albany, IN 47150
 Permit No.: **043-47916-00076**
 Permit Reviewer: **Pratim Moulk**

Vehicle Information provided by the source.

Type	Vehicle Type	Number of Vehicles per Day	Number of Vehicles per Week (5d/wk)	Number of Vehicles per Year (52wks/yr)	Annual Trips (one-way trip/year)	Maximum Weight Loaded (tons/trip)	Total Weight Driven (ton/year)	Maximum one-way distance (ft/trip)	Maximum one-way distance (mi/trip)	Vehicle Miles Traveled (miles/yr)
Beeler Street										
Incoming deliveries and shipments SW dock	Box Truck	4	20	1040	2080	7	14,560	65	0.012	26
Incoming deliveries and shipments SW dock	Semi-Truck	-	1	52	104	20	2,080	65	0.012	1
Finished product shipments SW dock	Box Truck	4	20	1040	2080	7	14,560	65	0.012	26
Employees	Passenger Vehicle	28	140	7280	14560	2	29,120	170	0.032	469
Total					18,824		60,320			521
Charlestown Road										
Incoming deliveries and shipments NW Warehouse dock	Semi-Truck	8	40	2080	4160	20	83,200	1,620	0.307	1,276
Finished product shipments NW Warehouse dock	Semi-Truck	4	20	1040	2080	20	41,600	1,620	0.307	638
Finished product shipments NW Warehouse dock	Small Truck	5	25	1300	2600	13	33,800	1,620	0.307	798
Employees (Parking Lot West of the Facility)	Passenger Vehicle	15	75	3900	7800	2	15,600	1,900	0.360	2,807
Employees (Parking Lot East of the Facility)	Passenger Vehicle	211	1,055	54860	109720	2	219,440	740	0.140	15,377
Total					126,360		393,640			20,897

Notes:

Number of vehicle estimates provided in e-mail from Debbie Roeder, dated 9/19/2022. Distance traveled are estimated using satellite view with dock locations provided in e-mail from Debbie Roeder, dated 9/19/2022. Charlestown Road: For a worst-case estimate, the farthest dock (longest drive distance) is assumed to receive all incoming deliveries and ship all finished products.

Emission Calculations

Process	Mitigated Emissions (tons/yr)			Controlled Emissions (tons/yr)		
	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Beeler Street						
Incoming deliveries and shipments SW dock	0.003	0.0007	0.0002	0.003	0.0007	0.0002
Incoming deliveries and shipments SW dock	0.000	0.000	0.000	0.000	0.000	0.000
Finished product shipments SW dock	0.003	0.0007	0.0002	0.003	0.0007	0.0002
Employees	0.061	0.01	0.00	0.06	0.01	0.00
Total	0.07	0.01	0.00	0.07	0.01	0.00
Charlestown Road						
Incoming deliveries and shipments NW Warehouse dock	0.162	0.032	0.008	0.162	0.032	0.008
Finished product shipments NW Warehouse dock	0.081	0.016	0.004	0.081	0.016	0.004
Finished product shipments NW Warehouse dock	0.101	0.020	0.005	0.101	0.020	0.005
Employees (Parking Lot West of the Facility)	0.357	0.071	0.018	0.357	0.071	0.018
Employees (Parking Lot East of the Facility)	1.956	0.391	0.096	1.956	0.391	0.096
Total	2.66	0.53	0.13	2.66	0.53	0.13

Notes:

Emissions calculated based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Maximum Daily Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

where k =	PM	PM10	PM2.5	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
	0.011	0.0022	0.00054	tons = average vehicle weight (See Table X-a)
W_{Beeler} =	3.2			tons = average vehicle weight (See Table X-a)
$W_{Charlestown}$ =	3.1			tons = average vehicle weight (See Table X-a)
sL =	9.7			g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Annual Average Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = $\frac{120}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

Beeler St.	PM	PM10	PM2.5	lb/mile
Unmitigated Emission Factor, E_f =	0.285	0.057	0.014	lb/mile
Mitigated Emission Factor, E_{ext} =	0.262	0.052	0.013	lb/mile
Dust Control Efficiency =	0%			Control efficiency not claimed for dust suppression measures

Charlestown Rd.	PM	PM10	PM2.5	lb/mile
Unmitigated Emission Factor, E_f =	0.277	0.055	0.014	lb/mile
Mitigated Emission Factor, E_{ext} =	0.254	0.051	0.012	lb/mile
Dust Control Efficiency =	0%			Control efficiency not claimed for dust suppression measures

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for an Administrative Amendment to a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name:	Graphic Packaging International, LLC
Source Location:	2549 Charlestown Road, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2752 (Commercial Printing, Lithographic, Not Elsewhere Classified)
Operation Permit No.:	M 043-45765-00076
Operation Permit Issuance Date:	December 9, 2022
Administrative Amendment No.:	043-47916-00076
Permit Reviewer:	Pratim Moulik

Source Definition

This source consists of the following two plants:

- (a) The Beeler Street plant, source ID 043-00057, located at 1502 Beeler St., New Albany, IN 47150; and
- (b) The Charlestown Road plant, source ID 043-00076, located at 2549 Charlestown Road, New Albany, IN 47150.

Graphic Packaging International, LLC owns and operates both plants. The Beeler Street plant sends printed cartons to the Charlestown Road plant for finishing and gluing. IDEM, OAQ has examined whether the two plants are part of the same major source. IDEM, OAQ has issued administratively separate permits to the sources that reflect that the two sources are part of the same major source. Source determination was established in Permit No. F043-39757-00076, issued on June 26, 2018, and F043-39590-00057, issued on June 27, 2018.

Existing Approvals

The source was issued MSOP Renewal No. 043-45765-00076 on December 9, 2022. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Floyd County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 5, 2022, for the 2015 8-hour ozone standard.

Pollutant	Designation
PM _{2.5}	Unclassifiable or attainment effective January 28, 2019, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
U.S. EPA, in the Federal Register Notice 87 FR 39750 dated July 5, 2022, designated Floyd County as attainment for the 2015 8-hour ozone standard effective July 5, 2022. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Floyd County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Floyd County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

This table reflects the unrestricted potential emissions of the source prior to the administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Administrative Amendment (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	7.69	2.2	0.437	0.02	3.79	74.66	3.18	1.71	6.11
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	10.42	2.74	0.57	0.02	3.79	74.66	3.18	1.71	6.11
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

³Single highest source-wide HAP (glycol ethers).

*Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of MSOP No. 043-45765-00076, issued on December 9, 2022.

Description of Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Graphic Packaging International, LLC on June 4, 2024, relating to the relocation of existing emission units from Beeler Street facility to Charlestown Facility, the removal of emission units, and the modification of three (3) lithographic printers.

The following is a list of the modified emission units:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, ~~constructed~~ constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

- (c) One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.

As part of this permitting action, the following emission units are being removed from the permit:

- (a) Three (3) Post Gluers, identified as PG-1, PG-2, and PG-3, constructed in 1990, with a maximum capacity of 10,000 cartons per hour each, uncontrolled, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this administrative amendment.

Emission Calculations

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

Permit Level Determination – MSOP Administrative Amendment

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Increase of the Modified Emission Unit(s)/Process(es) (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
PTE Before Modification (PMIT-2)	-	-	-	-	-	29.62	-	0.85	2.16
PTE After Modification (PMIT-2)	-	-	-	-	-	30.29	-	0.85	2.254
<i>PTE Increase (PMIT-2)</i>	-	-	-	-	-	0.67	-	0.00	0.098
PTE Before Modification (PMIT-1)	-	-	-	-	-	29.62	-	0.85	2.16
PTE After Modification (PMIT-1)	-	-	-	-	-	30.29	-	0.85	2.254
<i>PTE Increase (PMIT-1)</i>	-	-	-	-	-	0.67	-	0.00	0.098
PTE Before Modification (P40)	-	-	-	-	-	17.30	-	0.00	0.10
PTE After Modification (P40)	-	-	-	-	-	21.18	-	0.60	1.57
<i>PTE Increase (P40)</i>	-	-	-	-	-	3.88	-	0.60	1.47
Total PTE Increase of the Modified Emission Unit(s)/Process	-	-	-	-	-	5.22	-	0.60	1.642

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP (Glycol Ethers)

Commented [MMW1]: See .xls file for revision causing rates to tick up by 0.01 tpy.

Appendix A of this TSD reflects the detailed potential emissions of the administrative amendment.

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add or modify emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited Except VOC)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Beeler Street									
CU-1, CU-2, CU-3	0.04	0.15	0.15	0.01	1.94	0.11	1.63	-	0.04
P70	-	-	-	-	-	4.55	-	-	1.52
P80	-	-	-	-	-	1.48	-	-	0.01
Charlestown Road									
CU-4 through CU-24	0.04	0.14	0.14	0.01	1.84	0.1	1.55	-	0.03
PMIT-2**	-	-	-	-	-	21.38	-	0.85	2.254
PMIT-1**	-	-	-	-	-	21.38	-	0.85	2.254
P40	-	-	-	-	-	21.18	-	0.60	1.5760
IFP-1	-	-	-	-	-	0.35	-	-	-
IFP-2	-	-	-	-	-	0.28	-	-	-
IFP-3	-	-	-	-	-	0.35	-	-	-
IFP-4	-	-	-	-	-	1.38	-	-	-
IFP-5	-	-	-	-	-	1.38	-	-	-
IFP-6	-	-	-	-	-	2.31	-	-	-
P5	4.44	1.11	0.09	-	-	-	-	-	-
P6	-	-	-	-	-	1.48	-	-	0.01
P7	3.17	0.79	0.06	-	-	-	-	-	-
P8	-	-	-	-	-	0.38	-	-	-
P90	-	-	-	-	-	0.06	-	-	-
Total PTE of Entire Source Excluding Fugitive Emissions*	7.69	2.19	0.44	0.02	3.79	78.15 73.6	3.18	2.31	6.1676 6
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Paved Roads-Beeler	0.07	0.01	0.003	-	-	-	-	-	-
Paved Roads-Charlestown	2.66	0.53	0.13	-	-	-	-	-	-
Total PTE of Entire Source Including Source-Wide Fugitives*	10.42	2.74	0.57	0.02	3.79	78.15 73.6	3.18	2.31	7.6661 6
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

Commented [MMW2]: P70 has been removed from Beeler St. facility and no longer operates. It is NOT being relocated to the Charlestown Rd facility. It can be removed from the permit.

Commented [MMW3]: P80 remains in operation at Beeler St. facility so it should stay in the PTE calcs.

Commented [MMW5]: Revised total after removal of P70.

Commented [MMW4]: Revised total after removal of P70.

Commented [MMW7]: Revised total after removal of P70.

Commented [MMW6]: Revised total after removal of P70.

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited Except VOC)									
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
³ Single highest source-wide HAP (Glycol Ethers) *Fugitive HAP emissions are always included in the source-wide emissions. **These units each have a 326 IAC 8-1-6 VOC avoidance limit.									

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the administrative amendment, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for the lithographic presses PMIT-1, PMIT-2, and P40, because lithographic presses are not rotogravure presses.
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12, are not included in the permit for this source, because the source is not involved in creating sensitive tape nor is it involved in label surface coating.
- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF and 326 IAC 12, are not included in the permit for this source, because even though the source is a printing operation, the source is not involved in flexible vinyl and urethane printing.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this administrative amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO and IAC 20-77 are not included in the permit for this source, since the printing operation is not involved in printing, coating, and dyeing fabrics and other textiles.
- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this administrative amendment.

Commented [MMW8]: TSD for Permit 45765f also included non-applicability statements for the following NESHAPs:
 40 CFR 63 Subpart T
 40 CFR 63 Subpart KK
 40 CFR 63 Subpart JJJJ
 Are these no longer needed?

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

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

326 IAC 2-6.1 (MSOP)

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Administrative Amendment section of this document.

326 IAC 2-2 (PSD)

This source, a stationary commercial printing operation, is not one of the twenty-eight (28) source categories and has the potential to emit all pollutants less than 250 tons per year; therefore, the source is not subject to the requirements of 326 IAC 2-2 (PSD).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

State Rule Applicability – Individual Facilities

Due to the administrative amendment, state rule applicability has been reviewed as follows:

Lithographic Presses (PMIT-1 and PMIT-2)

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

These units were constructed after January 1, 1980, and ~~its-their~~ unlimited VOC potential emissions are each equal to or greater than twenty-five (25) tons per year and the units are not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from each of the units to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the units are not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

- (1) The VOC input to the two (2) Mitsubishi Litho Presses - 57 inch (7 color and coating), identified as PMIT-2 and PMIT-1, shall not exceed 21.38 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

This is an existing limit that is not being adjusted as part of this administrative amendment.

326 IAC 8-2-5 (Paper Coating Operations)

The provisions of 326 IAC 8-2-5 (Paper Coating Operations) do not apply to the Lithographic Presses (PMIT-1 and PMIT-2) because these presses are sheet-fed operations and do not perform web coating.

326 IAC 8-5-5 (Graphic Arts Operations)

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the Lithographic Presses (PMIT-1 and PMIT-2) because the rule only pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses.

326 IAC 8-5-5 (Offset Lithographic Printing and Letterpress Printing)

The provisions of 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing) do not apply to the Lithographic Presses (PMIT-1 and PMIT-2) because they are not located in Lake or Porter County.

Lithographic Press (P40)

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

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

326 IAC 8-2-5 (Paper Coating Operations)

The provisions of 326 IAC 8-2-5 (Paper Coating Operations) do not apply to the Lithographic Press P40 because the press is sheet-fed operations and does not perform web coating.

326 IAC 8-5-5 (Graphic Arts Operations)

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the Lithographic Press P40 because the rule only pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses.

326 IAC 8-5-5 (Offset Lithographic Printing and Letterpress Printing)

The provisions of 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing) do not apply to the Lithographic Press (P40) because it is not located in Lake or Porter County.

Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this administrative amendment.

Proposed Changes

The following changes listed below are due to the proposed administrative amendment. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Section A of the permit was updated to add new emission units and remove existing emission units.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.
- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors.
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors.
- ~~(h) Three (3) Post Glues, identified as PG-1, PG-2 and PG-3, constructed in 1990, with a maximum capacity of 10,000 cartons per hour each, uncontrolled, and exhausting indoors.~~
- (hi) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (ij) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors.
- (jk) One (1) Parts Washer (MS) identified as P6, with a maximum usage rate of 432 gallons per year.
- (kl) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.
- (lm) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.

- (m) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour.
 - (n) **One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.**
 - (o) **One (1) Plate Making Operation, identified as P90, constructed in 2022.**
 - (p) Fugitive dust; paved roads and parking lots [40 IAC 326 6-4]
- (2) Section D.1 of the permit was updated to change descriptive information for the existing lithographic presses

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

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

- (3) Section D.3, D.4, and D.5 of the permit were updated to change the lettering for the descriptive information of units

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) One (1) Parts Washer (MS), identified as P6, with a maximum usage rate of 432 gallons per year.
- (k) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.

- (ij) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors

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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (I#) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 4, 2024.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Pratim Moulik, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6871 or (800) 451-6027, and ask for Pratim Moulik or (317) 234-6871.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

From: [Moulik, Pratim](#)
To: [Michael M. Wiczorek](#)
Cc: debbie.roederer@graphicpkg.com
Subject: Applicant Review for MSOP AA No. 043-47916-00076 for Graphic Packaging International, LLC
Date: Wednesday, June 19, 2024 1:17:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[47916calc.xlsx](#)
[47916let.docx](#)
[47916per.docx](#)
[47916tsd.docx](#)
[image003.png](#)

Dear Mike Wiczorek/Debbie Roederer:

Attached please find the draft MSOP AA and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for MSOP AA permit No.: 043-47916-00076 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one (1) week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 26, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	MSOP Administrative Amendment
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Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

Scan the QR code to leave your feedback.

We appreciate your input!



**Appendix A: Emissions Calculations
Emissions Summary**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik

Emission Source	Uncontrolled Potential to Emit (tpy)								
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Single HAP*	Total HAP
Beeler Street Total	0.11	0.16	0.15	0.01	1.94	6.14	1.63	0.00	1.57
Charlestown Road Total	10.31	2.58	0.42	0.01	1.84	89.83	1.55	2.31	6.09
Annual Total	10.42	2.74	0.57	0.02	3.79	95.97	3.18	2.31	7.66

* Single Highest HAP = glycol ethers

Emission Unit	Emission Unit Description	PM		PM10		PM2.5		CO		NOx		SOx		VOC		Limited VOC
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
Beeler Street																
CU-1, CU-2, CU-3	Combustion Sources	0.01	0.04	0.03	0.15	0.03	0.15	0.37	1.63	0.44	1.94	0.003	0.01	0.02	0.11	0.11
P70	Basement Coater	--	--	--	--	--	--	--	--	--	--	--	--	1.04	4.55	4.55
P80	Parts Washer (VMW)	--	--	--	--	--	--	--	--	--	--	--	--	0.34	1.48	1.48
-	Paved Road Mitigated Fugitives	0.02	0.07	0.00	0.01	0.00	0.003	--	--	--	--	--	--	-	-	-
															6.14	6.14
Charlestown Road																
CU-4 through CU-24	Combustion Sources	0.01	0.04	0.03	0.14	0.03	0.14	0.35	1.55	0.42	1.84	0.003	0.01	0.02	0.10	0.10
PMIT-2	Mitsubishi Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	11.2	30.29	21.38
PMIT-1	Mitsubishi Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	11.2	30.29	21.38
P40	Heidelberg Litho Press	--	--	--	--	--	--	--	--	--	--	--	--	7.8	21.18	21.18
IFP-1	Inline Flexo Press 1	--	--	--	--	--	--	--	--	--	--	--	--	0.08	0.35	0.35
IFP-2	Inline Flexo Press 2	--	--	--	--	--	--	--	--	--	--	--	--	0.06	0.28	0.28
IFP-3	Inline Flexo Press 3	--	--	--	--	--	--	--	--	--	--	--	--	0.08	0.35	0.35
IFP-4	Inline Flexo Press 4	--	--	--	--	--	--	--	--	--	--	--	--	0.32	1.38	1.38
IFP-5	Inline Flexo Press 5	--	--	--	--	--	--	--	--	--	--	--	--	0.32	1.38	1.38
IFP-6	Inline Flexo Press 6	--	--	--	--	--	--	--	--	--	--	--	--	0.53	2.31	2.31
P5	Balers 1-3	1.01	4.44	0.25	1.11	0.02	0.09	--	--	--	--	--	--	--	--	--
P6	Parts Washer	--	--	--	--	--	--	--	--	--	--	--	--	0.34	1.48	1.48
P7	Baler 4	0.72	3.17	0.18	0.79	0.01	0.06	--	--	--	--	--	--	--	--	0.00
P8	Parts Washer	--	--	--	--	--	--	--	--	--	--	--	--	0.09	0.38	0.38
P90	Plate Making	--	--	--	--	--	--	--	--	--	--	--	--	0.01	0.06	0.06
-	Paved Road Mitigated Fugitives	0.61	2.66	0.12	0.53	0.03	0.13	--	--	--	--	--	--	--	--	--
															89.83	72.01
															95.97	78.15

Emission Source	Potential to Emit after Issuance (tpy)								
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Single HAP*	Total HAP
Beeler Street Total	0.11	0.16	0.15	0.01	1.94	6.14	1.63	0.00	1.57
Charlestown Road Total	10.31	2.58	0.42	0.01	1.84	72.01	1.55	2.31	6.09
Annual Total	10.42	2.74	0.57	0.02	3.79	78.15	3.18	2.31	7.66

* Single Highest HAP = glycol ethers

Appendix A: Emissions Calculations
HAP Potential Emissions

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moutik

Emission Point	Emissions (t/yr)	
	Single HAP (Glycol Ethers)	Total HAP
Beeler Street Total	0.00	1.57
Charlestown Road Total	2.31	6.09
Annual Total	2.31	7.66

*Single largest HAP is Glycol Ethers

Emission Unit	Emission Unit Description	HAP Emissions (t/yr)											HAP Emissions (t/yr)												
		Total HAP	Acetaldehyde	Benzene	Cadmium Compounds	Chromium Compounds	Cumene	Dichlorobenzene	Ethyl Acrylate	Ethyl Benzene	Ethylene Glycol	Formaldehyde	Glycol Ethers	Hexane	Hydroquinone	Lead Compounds	Manganese Compounds	Methanol	Naphthalene	Nickel Compounds	Toluene	Triethylamine	Vinyl Acetate	Xylenes (mixed isomers)	
Beeler Street																									
CU-1, CU-2, CU-3	Combustion Sources	0.04	--	0.00004	0.00002	0.00003	--	0.00002	--	--	--	0.001	--	0.03	--	0.00001	0.00001	--	--	0.00004	0.0001	--	--	--	
P70	Basement Cooler	1.52	0.30	--	--	--	--	--	0.30	--	--	0.30	--	--	--	--	0.30	--	--	--	--	--	0.30	--	
P80	Parts Washer (VMW)	0.0139	--	--	--	--	0.0041	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.0020	
			0.30	0.00004	0.00002	0.00003	0.00000	0.00002	0.30	0		0.30		0.00	0.03	0.00	0.00001	0.00001	0.30	0	0.00004	0.0001	0	0.30	0.00
Charlestown Road																									
CU-4 through CU-24	Combustion Sources	0.03	--	0.00004	0.00002	0.00003	--	0.00002	--	--	--	0.001	--	0.03	--	0.00001	0.00001	--	--	0.00004	0.00005	--	--	--	
PMT-2	Mitsubishi Litho Press	2.24	--	0.002	--	--	0.002	--	--	0.002	--	0.8	--	0.85	0.01	0.07	--	--	0.4	0.002	--	0.002	--	--	0.1
PMT-1	Mitsubishi Litho Press	2.24	--	0.002	--	--	0.002	--	--	0.002	--	0.8	--	0.85	0.01	0.07	--	--	0.4	0.002	--	0.002	--	--	0.1
P40	Heidelberg Litho Press	1.57	--	1.49E-03	--	--	0.01	--	--	1.49E-03	--	0.56	--	0.50	0.01	0.05	--	--	0.30	1.49E-03	--	1.49E-03	--	--	0.04
P6	Parts Washer (VMW)	0.0139	--	--	--	--	0.0041	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.0020
			0	0.006	0.00002	0.00003	0.017	0.00002	0	0.006		2.16		2.31	0.06	0.18	0.00001	0.00001	1.15	0.006	0.00004	0.006	0	0.00	0.18
Total			0.30	0.006	0.00004	0.00005	0.02	0.00005	0.30	0.006		2.16		2.31	0.10	0.18	0.00002	0.00002	1.46	0.006	0.006	0	0.30	0.18	

**Appendix A: Emissions Calculation
Modification**

**Source Name: Graphic Packa
Source Location: 2549 Charlest
1502 Beeler St
Permit No.: 043-47916-000**

Uncontrolled Potential to Emit of Modified Un					
Emission Unit		PM	PM ₁₀	PM _{2.5} *	SO ₂
PMIT-2	Before	0.00	0.00	0.00	0
PMIT-2	After	0.00	0.00	0.00	0.00
<i>PTE Increase</i>		<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
PMIT-1	Before	0.00	0.00	0.00	0.00
PMIT-1	After	0.00	0.00	0.00	0.00
<i>PTE Increase</i>		<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
P40	Before	0.00	0.00	0.00	0.00
P40	After	0.00	0.00	0.00	0.00
<i>PTE Increase</i>		<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
Total PTE Increase (tons/year):		0.00	0.00	0.00	0.00

**PM_{2.5} listed is direct PM_{2.5}*

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aging International, LLC
own Road, New Albany, IN 47150
treet, New Albany, IN 47150
176

its (tons/year)				
NO _x	VOC	CO	Combined HAPs	Single HAP (Glycol Ethers)
0	29.62	0	2.16	0.85
0.00	30.29	0.00	2.24	0.85
<i>0.00</i>	<i>0.67</i>	<i>0.00</i>	<i>0.08</i>	<i>0.00</i>
0.00	29.62	0.00	2.16	0.85
0.00	30.29	0.00	2.24	0.85
<i>0.00</i>	<i>0.67</i>	<i>0.00</i>	<i>0.08</i>	<i>0.00</i>
0.00	17.30	0.00	0.10	0.00
0.00	21.18	0.00	1.57	0.60
<i>0.00</i>	<i>3.88</i>	<i>0.00</i>	<i>1.47</i>	<i>0.60</i>
0.00	5.22	0.00	1.62	0.60

**Appendix A: Emissions Calculations
Potential Emission Calculations
Lithographic Printing/In-Line Coating VOC**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulk

Source ID	Emission Unit	Maximum Sheet Processing Rate ¹	Maximum Sheet Area	Potential Annual Hours of Printing and/or Coating ²	Maximum Sheet Processing Rate	Type of Material Applied or Used	Maximum Sheet Coverage ³	Material Usage Factor ⁴	Units	Maximum Material Usage Rate		Material VOC Content ⁵	Mass of VOC Applied to Sheet		Potential VOC Emission Rate ^{6,7}			
		(sheet/hr)	(ft ² /sheet)		(MMsheet/yr)					(lb/hr)	(lb/yr)	(wt%)	(lb/hr)	(lb/yr)	(lb/hr)	(tpy)		
Beeler Street																		
P70	Basement Coater (coating only)	2,000	7.60	8,760	18	Lithographic Ink				Not applied								
						Lithographic Coating	100%	0.0046	lb/ft ² print area	69.29	606,943	1.50%	1.04	9,104	1.04	4.55		
						Fountain Solution	Not applied											
						Wash Materials	N/A, only water is used for cleaning											
															P70 Total =		1.04	4.55
Charlestown Road																		
P40	Heidelberg Litho Press - 40 inch (7 color and coating)	15,000	7.89	7,884	118	Lithographic Ink	100%	0.0002	lb/ft ² print area	23.69	186,788	13.00%	3.08	24,282	0.15	0.61		
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	71.01	559,804	4.57%	3.24	25,583	3.24	12.79		
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	4.74	37,358	33.67%	1.60	12,578	1.60	6.29		
				1,051		Wash Materials	--	0.12	lb/lb ink applied	2.84	2,989	100.00%	2.84	2,989	2.84	1.49		
															P40 Total =		7.8	21.2
PMIT-2	Mitsubishi Litho Press - 57 inch (7 color and coating)	10,500	16.12	7,884	83	Lithographic Ink	100%	0.0002	lb/ft ² print area	33.88	267,111	13.00%	4.40	34,724	0.22	0.87		
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	101.54	800,533	4.57%	4.64	36,584	4.64	18.29		
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	6.78	53,422	33.67%	2.28	17,987	2.28	8.99		
				1,051		Wash Materials	--	0.12	lb/lb ink applied	4.07	4,274	100.00%	4.07	4,274	4.07	2.14		
															PMIT-2 Total =		11.2	30.3
PMIT-1	Mitsubishi Litho Press - 57 inch (7 color and coating)	10,500	16.12	7,884	83	Lithographic Ink	100%	0.0002	lb/ft ² print area	33.88	267,111	13.00%	4.40	34,724	0.22	0.87		
				7,884		Lithographic Coating	100%	0.0006	lb/ft ² print area	101.54	800,533	4.57%	4.64	36,584	4.64	18.29		
				7,884		Fountain Solution	--	0.20	lb/lb ink applied	6.78	53,422	33.67%	2.28	17,987	2.28	8.99		
				1,051		Wash Materials	--	0.12	lb/lb ink applied	4.07	4,274	100.00%	4.07	4,274	4.07	2.14		
															PMIT-1 Total =		11.2	30.3
															Total Lithographic Printing VOCs (tons/yr) =			86.3

Notes:

- ¹ Machine capacity (sheets/hr) is used to develop hourly emission estimates. Unless otherwise stated, annual emissions assume continuous operation throughout the year.
- ² Press potential operating times assume that over the course of a year, each press experiences 25% makeready time with a 20% safety factor. Washes between press runs are estimated to be 10% of the time with a 20% safety factor.
8760 hours x (1-25%) x 1.2 = 7,884 hours printing time
8760 hours x (10%) x 1.2 = 1,051 hours press wash time
- ³ Maximum sheet coverage assumes coating/printing over the entire sheet.
- ⁴ Material usage factors derived from historic operating data from the sheetfed offset lithographic printing operations at similar GPI facilities.
- ⁵ Ink and coating are not thinned, so material VOC content equals as-applied VOC content. Fountain solution concentrate is diluted with water before use. Values shown are based on consumption of fountain solution concentrate.
- ⁶ VOC emissions estimated by applying material VOC content to usage rate. According to EPA-453/R-06-002 (September 2006), ink VOC emissions apply retention factor of: 95%
- ⁷ Blanket/roller wash emissions conservatively do not apply a retention factor to account for material retained in shop towels used for press washing operations.

Equations:

- 1) Maximum material usage rate (ink or coating) (lb/hr) = Maximum Sheet Area (ft²/sheet) x Sheet Processing Rate (sheet/hr) x Material Usage Factor (lb/ft²)
- 2) Maximum material usage rate (fountain solution or wash material) (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor (lb/lb ink)
- 3) Mass of VOC Applied to Sheet (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)
- 4) VOC Emission Rate (inks) (lb/hr) = Mass of VOC applied to sheet (lb/hr) x (1 - 95% retention factor)
- 5) VOC Emission Rate (coating, fountain solution, wash material) (lb/hr) = Mass of VOC applied to sheet (lb/hr)

**Appendix A: Emissions Calculations
Potential VOC Emission Calculation
Charlestown Facility Only
Flexographic Printing**

**Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik**

	Max Operating Hours ¹ (hr/yr)	Web Width ² (ft)	Maximum Press Speed (ft/min)	Web Rate ³ (ft ² /hr)	Number of Print Stations	Press-ready Ink Application Rate ⁴ (lb/ft ²)
Charlestown Rd (Flexographic printing operations are not located at Beeler St facility)						
Inline Flexo Press 1	8,760	3.67	450	99,000	1	0.000042
Inline Flexo Press 2	8,760	3.00	450	81,000	1	0.000042
Inline Flexo Press 3	8,760	3.67	450	99,000	1	0.000042
Inline Flexo Press 4	8,760	3.67	450	99,000	4	0.000168
Inline Flexo Press 5	8,760	3.67	450	99,000	4	0.000168
Inline Flexo Press 6	8,760	4.58	800	220,000	3	0.000126

	Max Operating Hours (hr/yr)	VOC Wt%	Maximum Material Usage (lb/hr)	Material Usage (lbs/yr)	Potential VOC Emissions	
					(lb/hr)	(tpy)
Flexo Press 1 - Inks	8,760	1.84%	4.158	36,424	0.08	0.34
Fugitive Cleaning	8,760	0.50%	0.50	4,371	0.00	0.01
Press 1 Total =					0.08	0.35
Flexo Press 2 - Inks	8,760	1.84%	3.402	29,802	0.06	0.27
Fugitive Cleaning	8,760	0.50%	0.41	3,576	0.00	0.01
Press 2 Total =					0.06	0.28
Flexo Press 3 - Inks	8,760	1.84%	4.158	36,424	0.08	0.34
Fugitive Cleaning	8,760	0.50%	0.50	4,371	0.00	0.01
Press 3 Total =					0.08	0.35
Flexo Press 4 - Inks	8,760	1.84%	16.632	145,696	0.31	1.34
Fugitive Cleaning	8,760	0.50%	2.00	17,484	0.01	0.04
Press 4 Total =					0.32	1.38
Flexo Press 5 - Inks	8,760	1.84%	16.632	145,696	0.31	1.34
Fugitive Cleaning	8,760	0.50%	2.00	17,484	0.01	0.04
Press 5 Total =					0.32	1.38
Flexo Press 6 - Inks	8,760	1.84%	27.72	242,827	0.51	2.23
Fugitive Cleaning	8,760	0.50%	3.33	29,139	0.02	0.07
Press 6 Total =					0.53	2.31

Total Flexographic Printing VOCs (tons/yr) = 6.05

Flexo Inline Press Ink (lbs/ft²/station) = 0.000042

Notes:

- ¹ Based on operating 24 hrs/day, 365 days/yr without accounting for press make ready and press wash time.
- ² Inline Flexo Presses 1, 3, 4, and 5 have a maximum web width of 44"; Inline Flexo Press 2 has a max web width of 36"; Inline Flexo Press 6 has a max web width of 55".
- ³ Based on the maximum capacity of press.
- ⁴ Ink application rate (lb/ft²) is derived from recent operating data for the presses at this location adjusted for number of printing stations.

Equations:

- 1) Maximum ink usage rate (lb/hr) = Web Rate (ft²/hr) x Material Usage Factor (lb/ft²)
- 2) Maximum cleaner usage rate (lb/hr) = Maximum Rate of Ink Applied (lb/hr) x Material Usage Factor (0.12 lb/lb ink)
- 3) VOC Emission Rate (ink and wash material) (lb/hr) = Maximum material usage rate (lb/hr) x VOC Content (%)

**Appendix A: Emissions Calculations
Potential Emission Calculation
Charlestown Facility Only
Scrap Processing**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulk

Emission Unit	Total Potential Max Feed Rate (ton scrap/hr)	Uncontrolled Emission Rate ¹ PM		Uncontrolled Emission Rate ¹ PM10		Uncontrolled Emission Rate ¹ PM2.5		Allowable Emission (326 IAC 6-3-2) (lb/hr)	Controlled Emission Rate ³ (Baghouse Outlet) PM		Controlled Emission Rate ³ (Baghouse Outlet) PM10		Controlled Emission Rate ³ (Baghouse Outlet) PM2.5	
		(lb/hr)	(tpy) ²	(lb/hr)	(tpy) ²	(lb/hr)	(tpy) ²		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Baler 1-3 (P5)	10.50	1.01	4.44	0.25	1.11	0.02	0.09	19.81	5.07E-03	2.22E-02	1.27E-03	5.56E-03	2.03E-04	8.89E-04
Baler 4 (P7)	7.50	0.72	3.17	0.18	0.79	0.01	0.06	15.82	3.62E-03	1.59E-02	9.06E-04	3.97E-03	1.45E-04	6.35E-04

The Baler System which makes up the Scrap Processing System at the Charlestown facility is a collection system that captures and routes trim scrap from the cutting operations and shredded board to the baler to be baled for recycling using a dedicated separator/cyclone unit. The cyclone is considered inherent process equipment. Baler system exhaust is then routed to a baghouse dust collector for particulate control before exhausting via stack inside the building.

Design Parameters for Baler Systems and Associated Baghouse (Dust Collector)			
Parameter	Value	Units	Basis
Maximum Operating Hours	8,760	hr/yr	Assumes continuous annual operation for the new Scrap System (e.g., 24 hrs/day, 365 days/yr).
Filterable PM Emission Factor	0.097	lb PM/ton scrap	Baler source test at GPI's Riverwood International facility (May 2000) plus a 25% safety margin.
Percent of Uncontrolled FPM ≤10 μm in diameter	25%	%	AP-42, Appendix B.2, Table B.2.2, Category 6 Process: Grain Handling Material: Grain Assumes all PM generated by the scrap waste system is filterable (negligible condensable PM generation).
Percent of Uncontrolled FPM ≤2.5 μm in diameter	2%	%	Conservatively used maximum values for the most similar process type. In addition, conservatively assumes that cumulative percentage is the maximum value plus the standard deviation.
Baghouse Control Efficiency, PM	99.5%	%	AP-42, Appendix B.2, Table B.2.3 for fabric filters.
Baghouse Control Efficiency, PM10	99.5%	%	
Baghouse Control Efficiency, PM2.5	99%	%	

Notes:

¹ Uncontrolled filterable PM emission rates are based on a stack test-derived emission factor for a similar facility. The uncontrolled emission rates for PM10 and PM2.5 were then calculated based on Appendix B.2, Table B.2.2, Category 6 particle size distribution.

² Annual emissions for all PM species are based on the maximum hourly PM emission rate.

³ Controlled emission rates of filterable PM, PM10, and PM2.5 were calculated by applying the appropriate control efficiencies from AP-42, Appendix B.2, Table B.2.3 for fabric filters.

⁴ There are nine Bobst, Platen type, cutters that feed the baler system at the Charlestown facility. The Beeler facility does not have a pneumatic scrap system in place for their five cutters and therefore cutting operations are not considered a source of emissions.

Equations:

- 1) Uncontrolled PM Emission Rate (lb/hr) = Maximum Feed Rate for Scrap (ton scrap/hr) x PM Emission Factor (lb PM/ton scrap)
- 2) Uncontrolled PM10 Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 10 μm in diameter
- 3) Uncontrolled PM2.5 Emission Rate (lb/hr) = PM Emission Rate (lb/hr) x Percent of Uncontrolled FPM < 2.5 μm in diameter
- 4) Controlled PM Emission Rate (lb/hr) = Uncontrolled PM Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM)
- 5) Controlled PM10 Emission Rate (lb/hr) = Uncontrolled PM10 Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM10)
- 6) Controlled PM2.5 Emission Rate (lb/hr) = Uncontrolled PM2.5 Emission Rate (lb/hr) x (1 - Baghouse Control Efficiency, PM2.5)
- 7) Allowable Emissions (326 IAC 6-3-2) (lb/hr) = 4.1 * (Max throughput) (t/hr) ^0.67

**Appendix A: Emissions Calculations
Natural Gas Combustion**

Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik

Emission Unit ID	Combustion Source Description	Heat Input Capacity (MMBtu/hr)	Max Operating Hours (hr/yr)	Potential Throughput (MMCF/yr)
Beeler Street				
CU-1	Scotch Boiler	4.37	8,760	38
CU-2	Water Heater	0.08	8,760	0.6
CU-3	Office Furnace	0.08	8,760	0.6
Beeler Potential Throughput (MMCF/yr) =				38.8
Charlestown Road				
CU-4, CU-5, CU-6	Cambridge Units (3)	0.47	8,760	4.0
CU-7	Dayton 3e234d	0.25	8,760	2.1
CU-8	Airtemp 2524xc1451	0.19	8,760	1.6
CU-9	Lennox g51mp	0.10	8,760	0.9
CU-10	Dayton 3e133e	0.06	8,760	0.5
CU-11, CU-12, CU-13, CU-14	Dayton 3e132e (4)	0.12	8,760	1.0
CU-15	Dayton 3e233d	0.23	8,760	1.9
CU-16	Amana amh95	0.05	8,760	0.4
CU-17, CU-18	Dayton 3e404b	0.12	8,760	1.0
CU-19	Dayton 3e235d	0.30	8,760	2.6
CU-20	Lennox tga3005bh1g	0.48	8,760	4.1
CU-21	Carrier 48tcea06a1a6a0a0a0	0.12	8,760	1.0
CU-22	Carrier 48tced14a2g6a0a0a0a0	0.22	8,760	1.9
CU-23	Lennox 48tced24abt6a0f2a0	0.25	8,760	2.2
CU-24	MSK Pallet Bagger - Shrink Hood	1.34	8,760	11.5
Charlestown Potential Throughput (MMCF/yr) =				36.9

Total Potential Throughput (MMCF/yr) = 75.7

Pollutant	Emission Factor (lb/MMCF)	Beeler Potential Emission		Charlestown Potential Emission		Total Potential Emission	
		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Criteria Pollutants^{3,5}							
PM ¹	1.9	0.01	0.04	0.01	0.04	0.02	0.07
PM10	7.6	0.03	0.15	0.03	0.14	0.07	0.29
PM2.5	7.6	0.03	0.15	0.03	0.14	0.07	0.29
SO2	0.6	0.003	0.01	0.003	0.01	0.005	0.02
NOx ²	100	0.44	1.94	0.42	1.84	0.86	3.79
VOC	5.5	0.02	0.11	0.02	0.10	0.05	0.21
CO	84	0.37	1.63	0.35	1.55	0.73	3.18
HAPs^{3,4,5}							
Benzene	0.0021	0.00001	0.00004	0.00001	0.00004	0.00002	0.00008
Dichlorobenzene	0.0012	0.00001	0.00002	0.000005	0.00002	0.00001	0.00005
Formaldehyde	0.075	0.0003	0.001	0.0003	0.001	0.001	0.003
Hexane	1.8	0.01	0.03	0.01	0.03	0.02	0.07
Toluene	0.0034	0.00002	0.0001	0.00001	0.00006	0.00003	0.0001
Lead	0.0005	0.000002	0.00001	0.000002	0.00001	0.000004	0.00002
Cadmium	0.0011	0.000005	0.00002	0.000005	0.00002	0.000010	0.00004
Chromium	0.0014	0.00001	0.00003	0.000006	0.00003	0.00001	0.00005
Manganese	0.0004	0.000002	0.00001	0.000002	0.00001	0.000003	0.00002
Nickel	0.0021	0.00001	0.00004	0.000009	0.00004	0.00002	0.00008

Notes:

¹ PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

² Emission Factors for NOx: Uncontrolled = 100

³ All emission factors are based on normal firing.

⁴ The five highest organic and metal HAPs emission factors are provided above.

⁵ Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. Additional HAPs emission factors are available

Conversions:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Equations:

1) Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x Max Operating Hours (hr/yr) x 1 MMCF/1,020 MMBtu

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

3) Emission (lb/hr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / Max Operating Hours (hr/yr)

Methodology for HAPs is the same as VOCs

**Appendix A: Emissions Calculations
Parts Washers**

Source Name: Graphic Packaging International, LLC
 Source Location: 2549 Charlestown Road, New Albany, IN 47150
 1502 Beeler Street, New Albany, IN 47150
 Permit No.: 043-47916-00076
 Permit Reviewer: Pratim Moulik

Emission Unit	Maximum Usage Rate ¹ (gal/yr)	Density ² (lbs/gal)	VOC ² (wt%)	VOC ² (lb/gal)	Potential VOC Emissions ³	
					(lbs/hr)	(ton/yr)
Beeler Street						
Parts Washer P80 (VWM / Mirachem)	432	6.83	100%	6.83	0.34	1.48
Charlestown Road						
Parts Washer P6 (VWM / Mirachem)	432	6.83	100%	6.83	0.34	1.48
Parts Washer P8 (MS)	120	6.33	100%	6.33	0.09	0.38

Total VOC emissions = 0.76 3.33

Emission Unit	Maximum Usage Rate ¹ (gal/yr)	Density ² (lbs/gal)	Cumene (wt%)	Xylenes (wt%)	Cumene Emissions (tpy)	Xylenes Emissions (tpy)	Potential HAP Emissions	
							(lbs/hr)	(ton/yr)
Beeler Street								
Parts Washer P80 (VWM / Mirachem)	432	6.83	0.55%	1.34%	0.0041	0.0099	0.003	0.014
Charlestown Road								
Parts Washer P6 (VWM / Mirachem)	432	6.83	0.55%	1.34%	0.0041	0.0099	0.003	0.014
Parts Washer P8 (MS)	120	6.33	N/A; no HAPs in Mineral Spirits					

Total HAP emissions = 0.006 0.028

Notes:

¹ Maximum usage of each parts washer is based on how often solvent is changed out in a year.

² Density and VOC wt% are taken from SDS information of VWM, a solvent previously used at GPI. Even though the Mirachem solvent (currently used) has no VOC content and the VMW solvent has a VOC content less than 100%, emission estimates conservatively assume 100% VOC wt%. HAP wt% used is from the VWM solvent.

³ Short-term emissions are calculated assuming maximum usage occurs over a typical work schedule:

8,760

Equations:

- 1) VOC (lbs/gallon) = Density (lbs/gal) x VOC (wt%)
- 2) Potential VOC Emissions (lbs/hr) = VOC (lbs/gallon) x Max. Usage Rate (gallons/yr) / Max Operating Hours (hr/yr)
- 3) Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs
 Methodology for HAPs is the same as VOCs

**Appendix A: Emissions Calculations
Plate Making (Charlestown Road Only)**

**Source Name: Graphic Packaging International, LLC
Source Location: 2549 Charlestown Road, New Albany, IN 47150
1502 Beeler Street, New Albany, IN 47150
Permit No.: 043-47916-00076
Permit Reviewer: Pratim Moulik**

Material	Maximum Usage Rate ¹ (gal/yr)	Density (lbs/gal)	VOC (wt%)	VOC ² (lb/gal)	Potential VOC Emissions ^{3,4}		Emissions (lb/day) ⁴
					(lbs/hr)	(ton/yr)	
Charlestown Road (Plate Making was moved from Beeler to Charlestown)							
Plate developer	1,360	8.59	0%	0	0	0	0.34
Plate finisher	510	9.17	2.7%	0.24	0.01	0.06	
Replenisher	340	10.84	0%	0	0	0	

Total VOC emissions = 0.01 0.06

Notes:

¹ Maximum usage of each plate room material is scaled from past operating data, assuming that each press operates at its design capacity.

² VOC content and specific gravity are taken from MSDS information. Plate making materials currently in use do not contain HAPs.

³ Annual VOC emissions are calculated assuming that the entirety of volatile content is emitted during use.

⁴ Plate making qualifies as an insignificant activity under 326 IAC 2-7-1(42):

Emissions < 1.0 lb/day of each non-HAP regulated air pollutant;

Emissions < 1 lb/day of each HAP; and

Activity is not a process emission unit.

Equations:

1) VOC (lbs/gallon) = Density (lbs/gal) x VOC (wt%)

2) Potential VOC Emissions (lbs/hr) = VOC (lbs/gallon) x Max. Usage Rate (gallons/yr) / Max Operating Hours (hr/yr)

3) Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/hr) x Max Operating Hours (hr/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Paved Road Fugitive Emissions**

Source Name: Graphic Packaging International, LLC
 Source Location: 2549 Charlestown Road, New Albany, IN 47150
 1502 Beeler Street, New Albany, IN 47150
 Permit No.: 043-47916-00076
 Permit Reviewer: Pratim Moulik

Vehicle Information provided by the source.

Type	Vehicle Type	Number of Vehicles per Day	Number of Vehicles per Week (5d/wk)	Number of Vehicles per Year (52wks/yr)	Annual Trips (one-way trip/year)	Maximum Weight Loaded (tons/trip)	Total Weight Driven (ton/year)	Maximum one-way distance (ft/trip)	Maximum one-way distance (mi/trip)	Vehicle Miles Traveled (miles/yr)
Beeler Street										
Incoming deliveries and shipments SW dock	Box Truck	4	20	1040	2080	7	14,560	65	0.012	26
Incoming deliveries and shipments SW dock	Semi-Truck	-	1	52	104	20	2,080	65	0.012	1
Finished product shipments SW dock	Box Truck	4	20	1040	2080	7	14,560	65	0.012	26
Employees	Passenger Vehicle	28	140	7280	14560	2	29,120	170	0.032	469
Total					18,824		60,320			521
Charlestown Road										
Incoming deliveries and shipments NW Warehouse dock	Semi-Truck	8	40	2080	4160	20	83,200	1,620	0.307	1,276
Finished product shipments NW Warehouse dock	Semi-Truck	4	20	1040	2080	20	41,600	1,620	0.307	638
Finished product shipments NW Warehouse dock	Small Truck	5	25	1300	2600	13	33,800	1,620	0.307	798
Employees (Parking Lot West of the Facility)	Passenger Vehicle	15	75	3900	7800	2	15,600	1,900	0.360	2,807
Employees (Parking Lot East of the Facility)	Passenger Vehicle	211	1,055	54860	109720	2	219,440	740	0.140	15,377
Total					126,360		393,640			20,897

Notes:

Number of vehicle estimates provided in e-mail from Debbie Roeder, dated 9/19/2022. Distance traveled are estimated using satellite view with dock locations provided in e-mail from Debbie Roeder, dated 9/19/2022. Charlestown Road: For a worst-case estimate, the farthest dock (longest drive distance) is assumed to receive all incoming deliveries and ship all finished products.

Emission Calculations

Process	Mitigated Emissions (tons/yr)			Controlled Emissions (tons/yr)		
	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Beeler Street						
Incoming deliveries and shipments SW dock	0.003	0.0007	0.0002	0.003	0.0007	0.0002
Incoming deliveries and shipments SW dock	0.000	0.000	0.000	0.000	0.000	0.000
Finished product shipments SW dock	0.003	0.0007	0.0002	0.003	0.0007	0.0002
Employees	0.061	0.01	0.00	0.06	0.01	0.00
Total	0.07	0.01	0.00	0.07	0.01	0.00
Charlestown Road						
Incoming deliveries and shipments NW Warehouse dock	0.162	0.032	0.008	0.162	0.032	0.008
Finished product shipments NW Warehouse dock	0.081	0.016	0.004	0.081	0.016	0.004
Finished product shipments NW Warehouse dock	0.101	0.020	0.005	0.101	0.020	0.005
Employees (Parking Lot West of the Facility)	0.357	0.071	0.018	0.357	0.071	0.018
Employees (Parking Lot East of the Facility)	1.956	0.391	0.096	1.956	0.391	0.096
Total	2.66	0.53	0.13	2.66	0.53	0.13

Notes:

Emissions calculated based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Maximum Daily Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W_{Beeler} =	3.2			tons = average vehicle weight (See Table X-a)
$W_{Charlestown}$ =	3.1			tons = average vehicle weight (See Table X-a)
sL =	9.7			g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Annual Average Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = $\frac{120}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

Beeler St.	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.285	0.057	0.014	lb/mile
Mitigated Emission Factor, E_{ext} =	0.262	0.052	0.013	lb/mile
Dust Control Efficiency =	0%			Control efficiency not claimed for dust suppression measures

Charlestown Rd.	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.277	0.055	0.014	lb/mile
Mitigated Emission Factor, E_{ext} =	0.254	0.051	0.012	lb/mile
Dust Control Efficiency =	0%			Control efficiency not claimed for dust suppression measures



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

Debbie Roederer
Graphic Packaging International, LLC
2549 Charlestown Rd.
New Albany, IN 47150

Re: 043-47916-00076
Administrative Amendment to
MSOP Renewal No. M043-45765-00076

Dear Debbie Roederer,

Graphic Packaging International, LLC was issued a Minor Source Operating Permit (MSOP) Renewal No. 043-45765-00076 on December 9, 2022 for a stationary commercial printing operation located at 2549 Charlestown Rd. New Albany, IN 47150. On June 4, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to modify several printing presses, increasing VOC emissions.

Pursuant to the provisions of 326 IAC 2-6.1-6(d), the permit is hereby administratively amended as described in the attached Technical Support Document.

Please find attached the entire MSOP as amended.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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

If you have any questions regarding this matter, please contact Pratim Moulik, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6871 or (800) 451-6027, and ask for Pratim Moulik or (317) 234-6871.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit and Technical Support Document

cc: File - Floyd County
Floyd County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office



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Commissioner

Minor Source Operating Permit OFFICE OF AIR QUALITY

Graphic Packaging International, LLC
2549 Charlestown Road
New Albany, Indiana 47150

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

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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M043-45765-00076 Master Agency Interest ID: 30933	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Administrative Amendment No.: 043-47916-00076	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 9, 2027

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2	Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary	
SECTION B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12	Permit Renewal [326 IAC 2-6.1-7]	
B.13	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14	Source Modification Requirement	
B.15	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 13-17-3-2][IC 13-30-3-1]	
B.16	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17	Annual Fee Payment [326 IAC 2-1.1-7]	
B.18	Credible Evidence [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	11
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	11
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	13
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	13
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	13
C.10	Compliance Monitoring [326 IAC 2-1.1-11]	
C.11	Instrument Specifications [326 IAC 2-1.1-11]	
	Corrective Actions and Response Steps	14
C.12	Response to Excursions or Exceedances	
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	15
C.14	Malfunctions Report [326 IAC 1-6-2]	
C.15	Emission Statement [326 IAC 2-6]	

- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
- SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS17**
 - Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]17**
 - D.1.1 VOC BACT Avoidance Limit [326 IAC 8-1-6]
 - D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]
 - Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)].....17**
 - D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
 - Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]18**
 - D.1.4 Record Keeping Requirement
 - D.1.5 Reporting Requirements
- SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS19**
 - Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]19**
 - D.2.1 Volatile Organic Compounds (VOC) Limitations for Graphic Art Operations [326 IAC 8-5-5]
 - D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]
 - Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)].....20**
 - D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
 - Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]20**
 - D.2.4 Record Keeping Requirements
- SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS21**
 - Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]21**
 - D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]
 - D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
 - D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]
 - Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]22**
 - D.3.4 Record Keeping Requirements
- SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS23**
 - Emission Limitations and Standards [326 IAC 2-8-4(1)].....23**
 - D.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
 - D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS24**
 - Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]24**
 - D.5.1 Particulate Matter Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
 - D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- ANNUAL NOTIFICATION25**
- MSOP Quarterly Report.....26**
- MSOP Quarterly Report.....27**
- MALFUNCTION REPORT28**

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and 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 commercial printing operation.

Source Address:	2549 Charlestown Road, New Albany, Indiana 47150
General Source Phone Number:	812-941-3024
SIC Code:	2752 (Commercial Printing, Lithographic)
County Location:	Floyd
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7-1(22)]

This source consists of the following two plants:

- (a) The Beeler Street plant, source ID 043-00057, located at 1502 Beeler St., New Albany, IN 47150; and
- (b) The Charlestown Road plant, source ID 043-00076, located at 2549 Charlestown Road, New Albany, IN 47150.

Graphic Packaging International, LLC owns and operates both plants. The Beeler Street plant sends printed cartons to the Charlestown Road plant for finishing and gluing. IDEM, OAQ has examined whether the two plants are part of the same major source.

IDEM, OAQ will issue administratively separate permits to the sources that reflect that the two sources are part of the same major source. Source determination was established in Permit No. F043-39757-00076, issued on June 26, 2018, and F043-39590-00057, issued on June 27, 2018.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.
- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.

- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors.
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors.
- (h) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (i) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors.
- (j) One (1) Parts Washer (MS) identified as P6, with a maximum usage rate of 432 gallons per year.
- (k) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.
- (l) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.
- (m) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour.
- (n) One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.
- (o) One (1) Plate Making Operation, identified as P90, constructed in 2022.
- (p) Fugitive dust; paved roads and parking lots [40 IAC 326 6-4]

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, M043-45765-00076, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) 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 on or before the date it is due.

B.9 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) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M043-45765-00076 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 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 13-17-3-2][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, 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 the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempted 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, 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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and 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 emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (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.15 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

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

C.16 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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 on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 VOC BACT Avoidance Limit [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and in order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the followings:

The VOC emissions from the two (2) Mitsubishi Litho Presses - 57 inch (7 color and coating), identified as (PMIT-2 and PMIT-1) shall not exceed 21.38 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the two (2) Mitsubishi Litho Presses - 57-inch (7 color and coating), identified as (PMIT-2 and PMIT-1) to less than twenty-five (25) tons per year, each, and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to these units.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.1. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

Compliance with the limit in Condition D.1.1 shall be calculated by using the following formula for each press:

$$\text{VOC emissions (tons per year)} = \sum_{i=1}^n (U_i \times C_i) \times 1/2000 \text{ (lb/ton)} \times (1-R_f)$$

Where:

- U_i = ink, coating, fountain solution and/or wash usage in lb/yr
- C_i = ink, coating, fountain solution and/or wash VOC content %
- R_f = Retention factor

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The amount of raw material used on a monthly basis. Records shall include raw material usages and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month.
 - (3) The weight of VOC emitted for each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly summary of the information necessary to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C-General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors,
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors,
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors,

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) Limitations for Graphic Art Operations [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5(c) (Graphic Art Operations), the Permittee shall not cause, allow, or permit the operation of the flexographic printing lines, identified as IFP-1, IFP-2, IFP-3, IFP-4, IFP-5, and IFP-6, unless:
 - (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
 - (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
 - (c) for flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.
- (b) Pursuant to 326 IAC 8-5-5(f) (Graphic Art Operations), work practices shall be used to minimize VOC emissions from cleaning operations. Work practices shall include, but not be limited to, the following:
 - (1) When not in use, all cleaning materials shall be kept in closed containers.
 - (2) Cleaning materials shall be conveyed from one (1) location to another in closed containers or pipes.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and solids content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee’s obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) One (1) Parts Washer (MS), identified as P6, with a maximum usage rate of 432 gallons per year.
- (k) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.

- (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.3. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:

 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (i) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors

(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.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from Balers 1-3 (P5) shall not exceed 19.81 pounds per hour when operating at a process weight rate of 10.5 tons per hour. The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from Baler 4 (P7) shall not exceed 15.8 pounds per hour when operating at a process weight rate of 7.5 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.4. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (l) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.5.1 Particulate Matter Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions from MSK Pallet Bagger - Shrink Wrap Heater (CU-24) shall be limited to 0.6 pounds per MMBtu heat input.

D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in Section D.5. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**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). The initial notification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent notifications shall cover the time period from January 1 to December 31 of the previous year.

Company Name:	Graphic Packaging International, LLC
Source Address:	2549 Charlestown Road
City:	New Albany, Indiana 47150
Phone #:	812-941-3024
MSOP #:	M043-45765-00076

I hereby certify that Graphic Packaging International, LLC is: still in operation.
 no longer in operation.

I hereby certify that Graphic Packaging International, LLC is: in compliance with the requirements of MSOP M043-45765-00076.
 not in compliance with the requirements of MSOP M043-45765-00076.

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:

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

MSOP Quarterly Report

Source Name: Graphic Packaging International, LLC
 Source Address: 2549 Charlestown Road, New Albany, IN 47150
 MSOP Permit No.: M043-45765-00076
 Facility: Mitsubishi Litho Press - 57 inch (7 color and coating), identified as PMIT-2
 Parameter: The VOC emissions
 Limit: shall not exceed 21.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

MSOP Quarterly Report

Source Name: Graphic Packaging International, LLC
 Source Address: 2549 Charlestown Road, New Albany, IN 47150
 MSOP Permit No.: M043-45765-00076
 Facility: Mitsubishi Litho Press - 57 inch (7 color and coating), identified as PMIT-1
 Parameter: The VOC emissions
 Limit: shall not exceed 21.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

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

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for an Administrative Amendment to a
Minor Source Operating Permit (MSOP) Renewal**

Source Description and Location

Source Name:	Graphic Packaging International, LLC
Source Location:	2549 Charlestown Road, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2752 (Commercial Printing, Lithographic, Not Elsewhere Classified)
Operation Permit No.:	M 043-45765-00076
Operation Permit Issuance Date:	December 9, 2022
Administrative Amendment No.:	043-47916-00076
Permit Reviewer:	Pratim Moulik

Source Definition

This source consists of the following two plants:

- (a) The Beeler Street plant, source ID 043-00057, located at 1502 Beeler St., New Albany, IN 47150; and
- (b) The Charlestown Road plant, source ID 043-00076, located at 2549 Charlestown Road, New Albany, IN 47150.

Graphic Packaging International, LLC owns and operates both plants. The Beeler Street plant sends printed cartons to the Charlestown Road plant for finishing and gluing. IDEM, OAQ has examined whether the two plants are part of the same major source. IDEM, OAQ has issued administratively separate permits to the sources that reflect that the two sources are part of the same major source. Source determination was established in Permit No. F043-39757-00076, issued on June 26, 2018, and F043-39590-00057, issued on June 27, 2018.

Existing Approvals

The source was issued MSOP Renewal No. 043-45765-00076 on December 9, 2022. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Floyd County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 5, 2022, for the 2015 8-hour ozone standard.

Pollutant	Designation
PM _{2.5}	Unclassifiable or attainment effective January 28, 2019, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 87 FR 39750 dated July 5, 2022, designated Floyd County as attainment for the 2015 8-hour ozone standard effective July 5, 2022. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Floyd County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Floyd County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

This table reflects the unrestricted potential emissions of the source prior to the administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Administrative Amendment (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	7.69	2.2	0.437	0.02	3.79	74.66	3.18	1.71	6.11
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	10.42	2.74	0.57	0.02	3.79	74.66	3.18	1.71	6.11
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP (glycol ethers).
 *Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of MSOP No. 043-45765-00076, issued on December 9, 2022.

Description of Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Graphic Packaging International, LLC on June 4, 2024, relating to the relocation of existing emission units from Beeler Street facility to Charlestown Facility, the removal of emission units, and the modification of three (3) lithographic printers.

The following is a list of the modified emission units:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 and approved in 2024 for modification, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

- (c) One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.

As part of this permitting action, the following emission units are being removed from the permit:

- (a) Three (3) Post Gluers, identified as PG-1, PG-2, and PG-3, constructed in 1990, with a maximum capacity of 10,000 cartons per hour each, uncontrolled, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this administrative amendment.

Emission Calculations

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

Permit Level Determination – MSOP Administrative Amendment

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Increase of the Modified Emission Unit(s)/Process(es) (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
PTE Before Modification (PMIT-2)	-	-	-	-	-	29.62	-	0.85	2.16
PTE After Modification (PMIT-2)	-	-	-	-	-	30.29	-	0.85	2.24
<i>PTE Increase (PMIT-2)</i>	-	-	-	-	-	<i>0.67</i>	-	<i>0.00</i>	<i>0.08</i>
PTE Before Modification (PMIT-1)	-	-	-	-	-	29.62	-	0.85	2.16
PTE After Modification (PMIT-1)	-	-	-	-	-	30.29	-	0.85	2.24
<i>PTE Increase (PMIT-1)</i>	-	-	-	-	-	<i>0.67</i>	-	<i>0.00</i>	<i>0.08</i>
PTE Before Modification (P40)	-	-	-	-	-	17.30	-	0.00	0.10
PTE After Modification (P40)	-	-	-	-	-	21.18	-	0.60	1.57
<i>PTE Increase (P40)</i>	-	-	-	-	-	<i>3.88</i>	-	<i>0.60</i>	<i>1.47</i>
Total PTE Increase of the Modified Emission Unit(s)/Process	-	-	-	-	-	5.22	-	0.60	1.62
¹ PM _{2.5} listed is direct PM _{2.5} . ² Single highest HAP (Glycol Ethers)									

Appendix A of this TSD reflects the detailed potential emissions of the administrative amendment.

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add or modify emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited Except VOC)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Beeler Street									
CU-1, CU-2, CU-3	0.04	0.15	0.15	0.01	1.94	0.11	1.63	-	0.04
P70	-	-	-	-	-	4.55	-	-	1.52
P80	-	-	-	-	-	1.48	-	-	0.01
Charlestown Road									
CU-4 through CU-24	0.04	0.14	0.14	0.01	1.84	0.1	1.55	-	0.03
PMIT-2**	-	-	-	-	-	21.38	-	0.85	2.24
PMIT-1**	-	-	-	-	-	21.38	-	0.85	2.24
P40	-	-	-	-	-	21.18	-	0.60	1.60
IFP-1	-	-	-	-	-	0.35	-	-	-
IFP-2	-	-	-	-	-	0.28	-	-	-
IFP-3	-	-	-	-	-	0.35	-	-	-
IFP-4	-	-	-	-	-	1.38	-	-	-
IFP-5	-	-	-	-	-	1.38	-	-	-
IFP-6	-	-	-	-	-	2.31	-	-	-
P5	4.44	1.11	0.09	-	-	-	-	-	-
P6	-	-	-	-	-	1.48	-	-	0.01
P7	3.17	0.79	0.06	-	-	-	-	-	-
P8	-	-	-	-	-	0.38	-	-	-
P90	-	-	-	-	-	0.06	-	-	-
Total PTE of Entire Source Excluding Fugitive Emissions*	7.69	2.19	0.44	0.02	3.79	78.15	3.18	2.31	7.66
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Paved Roads-Beeler	0.07	0.01	0.003	-	-	-	-	-	-
Paved Roads-Charlestown	2.66	0.53	0.13	-	-	-	-	-	-
Total PTE of Entire Source Including Source-Wide Fugitives*	10.42	2.74	0.57	0.02	3.79	78.15	3.18	2.31	7.66
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited Except VOC)									
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
³ Single highest source-wide HAP (Glycol Ethers) *Fugitive HAP emissions are always included in the source-wide emissions. **These units each have a 326 IAC 8-1-6 VOC avoidance limit.									

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the administrative amendment, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for the lithographic presses PMIT-1, PMIT-2, and P40, because lithographic presses are not rotogravure presses.
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12, are not included in the permit for this source, because the source is not involved in creating sensitive tape nor is it involved in label surface coating.
- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF and 326 IAC 12, are not included in the permit for this source, because even though the source is a printing operation, the source is not involved in flexible vinyl and urethane printing.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this administrative amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO and IAC 20-77 are not included in the permit for this source, since the printing operation is not involved in printing, coating, and dyeing fabrics and other textiles.
- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this administrative amendment.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

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

326 IAC 2-6.1 (MSOP)

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Administrative Amendment section of this document.

326 IAC 2-2 (PSD)

This source, a stationary commercial printing operation, is not one of the twenty-eight (28) source categories and has the potential to emit all pollutants less than 250 tons per year; therefore, the source is not subject to the requirements of 326 IAC 2-2 (PSD).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

State Rule Applicability – Individual Facilities

Due to the administrative amendment, state rule applicability has been reviewed as follows:

Lithographic Presses (PMIT-1 and PMIT-2)

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

These units were constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the units are not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from each of the units to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the units are not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

- (1) The VOC input to the two (2) Mitsubishi Litho Presses - 57 inch (7 color and coating), identified as PMIT-2 and PMIT-1, shall not exceed 21.38 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

This is an existing limit that is not being adjusted as part of this administrative amendment.

326 IAC 8-2-5 (Paper Coating Operations)

The provisions of 326 IAC 8-2-5 (Paper Coating Operations) do not apply to the Lithographic Presses (PMIT-1 and PMIT-2) because these presses are sheet-fed operations and do not perform web coating.

326 IAC 8-5-5 (Graphic Arts Operations)

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the Lithographic Presses (PMIT-1 and PMIT-2) because the rule only pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses.

Lithographic Press (P40)

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

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

326 IAC 8-2-5 (Paper Coating Operations)

The provisions of 326 IAC 8-2-5 (Paper Coating Operations) do not apply to the Lithographic Press P40 because the press is sheet-fed operations and does not perform web coating.

326 IAC 8-5-5 (Graphic Arts Operations)

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the Lithographic Press P40 because the rule only pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses.

Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this administrative amendment.

Proposed Changes

The following changes listed below are due to the proposed administrative amendment. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Section A of the permit was updated to add new emission units and remove existing emission units.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.
- (c) One (1) Inline Flexo Press, identified as IFP-1, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (d) One (1) Inline Flexo Press, identified as IFP-2, constructed in 1997, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (e) One (1) Inline Flexo Press, identified as IFP-3, constructed in 1998, with a maximum capacity of 450 feet per minute, uncontrolled, and exhausting indoors.
- (f) Two (2) Inline Flexo Press, identified as IFP-4 and IFP-5, constructed in 2000, with a maximum capacity of 450 feet per minute each, uncontrolled, and exhausting indoors.
- (g) One (1) Inline Flexographic Press, identified as IFP-6, permitted in 2021, with a maximum capacity of 800 feet per minute, uncontrolled, and exhausting indoors.
- ~~(h) Three (3) Post Glues, identified as PG-1, PG-2 and PG-3, constructed in 1990, with a maximum capacity of 10,000 cartons per hour each, uncontrolled, and exhausting indoors.~~
- (hi) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (ij) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors.
- (jk) One (1) Parts Washer (MS) identified as P6, with a maximum usage rate of 432 gallons per year.
- (kl) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.
- (lm) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.
- (mn) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour.
- (n) **One (1) Heidelberg Lithographic Press - 40" (7 color and coating), identified as P40, constructed in 2015 and approved in 2024 for modification, with a maximum capacity of 15,000 sheets per hour, uncontrolled, and exhausting to stacks EP-40a, EP-40b, and EP-40c.**
- (o) **One (1) Plate Making Operation, identified as P90, constructed in 2022.**

(pe) Fugitive dust; paved roads and parking lots [40 IAC 326 6-4]

- (2) Section D.1 of the permit was updated to change descriptive information for the existing lithographic presses

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-2, constructed in 2015 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-2.
- (b) One (1) Mitsubishi Lithographic Press - 57" (7 color and coating), identified as PMIT-1, constructed in 2007 **and approved in 2024 for modification**, with a maximum capacity of 10,500 sheets per hour, uncontrolled, and exhausting to stack EP-PMIT-1.

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

- (3) Section D.3, D.4, and D.5 of the permit were updated to change the lettering for the descriptive information of units

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (jk) One (1) Parts Washer (MS), identified as P6, with a maximum usage rate of 432 gallons per year.
- (kl) One (1) Parts Washer, identified as P8, permitted in 2021, with a maximum usage rate of 120 gallons per year.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (hi) Three (3) Balers 1-3, identified together as P5, constructed in 2002, 2004, and 2005, with a combined maximum capacity of 10.5 tons per hour, uncontrolled, and exhausting indoors.
- (ij) One (1) Baler 4, identified as P7, permitted in 2021, with a maximum capacity of 7.5 tons per hour, uncontrolled, and exhausting indoors

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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(I~~m~~) One (1) MSK Pallet Bagger – Shrink Wrap Heater (CU-24), permitted in 2021, with a maximum heat input capacity of 1.34 MMBtu per hour.

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 4, 2024.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Pratim Moulik, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6871 or (800) 451-6027, and ask for Pratim Moulik or (317) 234-6871.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

BILLING WORKSHEET
MSOP, Registration, Exemptions

For Applications Received On and After October 1, 2019

Permit #: 043-47916-00076
 Permit Reviewer: Pratim Moulik
 Application Received Date: 4-Jun-24

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.

MSOP Fees			
<input type="checkbox"/>		\$100	MSOP
<input type="checkbox"/>		\$600	MSOP w/NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP w/NSR (120)*
<input type="checkbox"/>		\$600	MSOP Min Permit Revision (45)
<input type="checkbox"/>		\$100	MSOP Renewal
<input type="checkbox"/>		\$600	MSOP Renewal / Minor NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP Renewal / Sig NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$3,500	MSOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>		\$100	MSOP Relocation

* Bill \$600 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$3500 when the permit includes a modification (new or modified equipment) at SPR levels.

Registration Fees			
<input type="checkbox"/>		\$600	Registration – (New Source subject to 326 IAC 2-5.1-2)
<input type="checkbox"/>		\$100	Registration Relocation
<input type="checkbox"/>		\$600	Registration Revision and Re-Registration – (Existing Sources subject to 326 IAC 2-5.5)

Exemption Fees			
<input type="checkbox"/>		\$100	Exemption

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions.
		\$500	for each review for an applicable NSPS
		\$500	for each review for an applicable NESHAP
		\$600	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT

For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]

Other Fees			
<input type="checkbox"/>		\$500	Interim – Any type
<input type="checkbox"/>		\$500	Public Hearing

\$0 Total Applicable Fee

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: Graphic Packaging International, LLC

TEMPO AI: 30933

Permit #: 043-47916-00076

CST #:

Credit for permit fees: \$

Credit Received Date:

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ \$0

Total Credit: \$ \$0

Total Permitting Fees Applicable: \$ \$0

Total Refund Due: \$

Reason for Refund:

Adjustments to Applicable Fees: \$

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title:

Address:

Permit Reviewer: Pratim Moulik

Date: 6/14/2024