

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility: Amcor Flexibles North America, Inc.**  
**Facility Location: 1400 E. O'Neal St., Centerville, IA**

**Air Quality Operating Permit Number: 01-TV-001R4**  
**Expiration Date: November 12, 2028**  
**Permit Renewal Application Deadline: May 12, 2028**

**EIQ Number: 92-5276**  
**Facility File Number: 04-01-002**

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**Responsible Official**

**Name: Curtis Hayes**  
**Title: Plant Manager**  
**Mailing Address: 1400 E. O'Neal St., Centerville, IA 52544**  
**Phone #: 641-437-6263**

**Permit Contact Person for the Facility**

**Name: John Cohrs**  
**Title: EHS Manager**  
**Mailing Address: 1400 E O'Neal St, Centerville, IA 52544**  
**Phone #: 641-437-6391**

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

**For the Director of the Department of Natural Resources**

*Marnie Stein*

11/13/2023

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Marnie Stein, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
CE .....	control equipment
CEM.....	continuous emission monitor
°F .....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP .....	emission point
EU .....	emission unit
gr./dscf .....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NAICS.....	North American Industry Classification System
NSPS .....	new source performance standard
ppmv .....	parts per million by volume
lb./hr.....	pounds per hour
lb./MMBtu .....	pounds per million British thermal units
SCC.....	Source Classification Codes
scfm.....	standard cubic feet per minute
SIC.....	Standard Industrial Classification
TPY .....	tons per year
USEPA.....	United States Environmental Protection Agency

### **Pollutants**

PM.....	particulate matter
PM <sub>10</sub> .....	particulate matter ten microns or less in diameter
SO <sub>2</sub> .....	sulfur dioxide
NO <sub>x</sub> .....	nitrogen oxides
VOC.....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Amcor Flexibles North America, Inc.

Permit Number: 01-TV-001R4

Facility Description: Plastic Packaging Manufacturer (SIC 2673)

## Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	Construction Permit Number
<b>Uncontrolled Presses &amp; Ovens</b>			
56	P10BP	Press 10 & Press Cleanup	01-A-643-S2
	P10A	Press 10 Oven	
57	P11BP	Press 11 & Press Cleanup	01-A-644-S2
	P11A	Press 11 Oven	
81	P14	Press 14 Oxidizer Bypass	03-A-1207-S1
75	P15	Press 15	01-A-647-S2
	P15A	Press 15 Oven Bypass	
77	P16BP	Press 16 Oven Bypass	01-A-646-S5
	P16A	Press 16	
90	P17	Press 17 Bypass Stack	16-A-385
<b>Controlled Sources Through EP-74</b>			
74	P10	Press 10 Printing	01-A-641-S5
	P10A	Press 10 Oven	
	P11	Press 11 Printing	
	P11A	Press 11 Oven	
	P14	Press 14 Printing	
	P15	Press 15 Printing	
	P15A	Press 15 Oven	
	P16	Press 16 Printing	
	P16A	Press 16 Oven	
	P17	Press 17	
	RTO1	Oxidizer (natural gas)	
<b>Other Emission Generating Processes</b>			
55	P10C	Press 10 Corona Treater	96-A-352-S4
58	P11C	Press 11 Corona Treater	93-A-376-S5
69	EBCU5	Electron Beam Curing Unit 5	00-A-1180-S6
70	TRETL	Film Treater – large	00-A-1181-S4
78	P16C	Press 16 Corona Treater	01-A-648-S2
82	P14C	Press 14 Corona Treater 1	03-A-1208
83	P14C2	Press 14 Corona Treater 2	03-A-1209

Emission Point Number	Emission Unit Number	Emission Unit Description	Construction Permit Number
76	P15C	Press 15 Corona Treater	01-A-649-S1
91	P17C	Press 17 Corona Treater	16-A-384-S1
63	INKMIX	Ink Mix and Storage Room	01-A-650
65	B1	Boiler 1 (Natural Gas) 0.02 MMcf/hr	Grandfathered
	B1A	Boiler 1 (Fuel Oil) 0.13 1000 gal/hr	
66	B2	Boiler 2 (Natural Gas) 0.02 MMcf/hr	Grandfathered
	B2A	Boiler 2 (Fuel Oil) 0.13 1000 gal/hr	
73	PAINT	Maintenance Paint Booth	96-A-576-S3
EP F3	COEXB7	PE/PVDC Co-Extruder B7	Grandfathered
	COEXB8	PE/PVDC Co-Extruder B8	
	COEXB10	PE/PVDC Co-Extruder B10	
	COEXB11	PE/PVDC Co-Extruder B11	
	COEXB12	PE/PVDC Co-Extruder B12	
	COEXB13	PE/PVDC Co-Extruder B13	
	COEXB14	PE/PVDC Co-Extruder B14	
	COEXB15	PE/PVDC Co-Extruder B15	
	COEXB16	PE/PVDC Co-Extruder B16	
	COEXB17	PE/PVDC Co-Extruder B17	
EP F4	COEXB18	PE/PVDC Co-Extruder B18	Exempt
	5HEAT1	Bldg 5 Space Heater 1	
	5HEAT2	Bldg 5 Space Heater 2	
	5HEAT3	Bldg 5 Space Heater 3	
	5HEAT4	Bldg 5 Space Heater 4	
	5AHEAT1	Bldg 5A Space Heater 1	
	5AHEAT2	Bldg 5A Space Heater 2	
	7AHEAT1	Bldg 7A Space Heater 1	
	33HEAT1	Bldg 33 Space Heater 1	
34HEAT1	Bldg 34 Space Heater 1		
EP F5	PRTWSH	SafetyKleen Parts washer	Not applicable
FS4	PESILO4	Polyethylene Storage Silo 4	03-A-1210
FS5	PESILO5	Polyethylene Storage Silo 5	03-A-1211
FS6	PESILO6	Polyethylene Storage Silo 6	03-A-1212
FS7	PESILO7	Polyethylene Storage Silo 7	03-A-1213
85	FINCLEAN	Ink Staging & Parts Cleaning	Grandfathered

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>Construction Permit Number</b>
EPF8	COEXB19	Shrink Extruder B19	12-A-522-S1
	COEXB20	Shrink Extruder B20	
	COEXB21	Shrink Extruder B21	
	COEXB22	Shrink Extruder B22	
93	BM91	Bag Machine 91 Corona Treater	20-A-168-S1
94	BM92	Bag Machine 92 Corona Treater	20-A-169-S1
95	BM93	Bag Machine 93 Corona Treater	20-A-170-S1
FINA (Finishing Area)	Bellmark A	Portable Press	N/A
	Bellmark B	Portable Press	
	Bellmark C	Portable Press	
	Bellmark D	Portable Press	

**Insignificant Activities Equipment List**

<b>Insignificant Emission Unit Number</b>	<b>Insignificant Emission Unit Description</b>
FUELOIL	No. 2 Fuel Oil Storage (1000 gal)
POWD	Powdering
POWDEXT	Extrusion Area Dust Collection
POWDFINISH	Finishing Area Dust Collection
POWDPRESS	Press Area Dust Collection
PESILO1	Polyethylene Storage Silo 1
PESILO2	Polyethylene Storage Silo 2
PESILO3	Polyethylene Storage Silo 3
LABHOOD	Lab Test Hood
DIEOVEN	Die Cleaning Oven*

\*This unit qualifies for the small unit exemption.

## II. Plant-Wide Conditions

Facility Name: Amcor Flexibles North America, Inc.  
Permit Number: 01-TV-001R4

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

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### Permit Duration

The term of this permit is: 5 years  
Commencing on: November 13, 2023  
Ending on: November 12, 2028

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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### Plant-Wide Emission Limits

*The atmospheric emissions from the plant as a whole shall not exceed the following:*

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): 240.0 TPY <sup>(1)</sup>  
Authority for Requirement: DNR Construction Permits 01-A-643-S2,  
01-A-644-S2, 01-A-646-S5, 03-A-1207-S1, 01-A-647-S2,  
01-A-641-S5, 12-A-522-S1, 16-A-385

<sup>(1)</sup>Total VOC emissions from all printing inks, coatings and solvents used in all printing operations at this facility (Plant Number 04-01-002) shall not exceed 240.0 tons per twelve-month period.

Pollutant: Single HAP (facility-wide)  
Emission Limits: 9.4 tpy  
Authority for Requirement: DNR Construction Permits 01-A-641-S5, 01-A-646-S5,  
12-A-522-S1, 16-A-385

Pollutant: Total HAP (facility-wide)  
Emission Limits: 24.4 tpy  
Authority for Requirement: DNR Construction Permits 01-A-641-S5, 01-A-646-S5,  
12-A-522-S1, 16-A-385

### **Operating Condition Monitoring**

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. The owner or operator shall maintain daily records that show the identity, quantity, single and total HAP content, and VOC content of each printing ink, coating and solvent used per process.
- B. Total VOC emissions from all printing inks, coatings and solvents used in all printing operations at this facility (Plant Number: 04-01-002) shall not exceed 240.00 tons per twelve-month period.
  - i. The owner or operator shall calculate and record the VOC emissions from all printing operations each month.
  - ii. The owner or operator shall use an overall control efficiency of 60% for presses 10 and 11 and an overall control efficiency of 81% for presses 14, 15, 16, and 17.
  - iii. A different overall control efficiency may be used if that overall control efficiency has been verified by stack testing data that was approved by the Department.
  - iv. If the rolling, 12-month total VOC emissions from all printing operations at the facility (Plant Number: 04-01-002) exceed 180.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
    - a. The total emissions of VOC (tons) from all printing operations at the facility (Plant Number: 04-01-002); and,
    - b. The rolling 365-day total amount of VOC emissions from all printing operations at the facility (Plant Number: 04-01-002).
- C. Single and total HAP emissions from this facility (Plant Number: 04-01-002) shall not exceed 9.4 and 24.4 tons per twelve-month period respectively.
  - i. The owner or operator shall calculate and record single HAP and total HAP emissions from each emission point each month.
  - ii. The owner or operator shall use an overall control efficiency of 60% for presses 10 and 11 and an overall control efficiency of 81% for presses 14, 15, 16, and 17.
  - iii. A different overall control efficiency may be used if that overall control efficiency has been verified by stack testing data that was approved by the Department.
  - iv. If the rolling, 12-month total emissions of any single HAP from all printing operations at the facility (Plant Number: 04-01-002) exceed 7.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
    - a. The total emissions of any single HAP (tons) from all printing operations at the facility (Plant Number: 04-01-002); and,
    - b. The rolling 365-day total amount of single HAP emissions from all printing operations at the facility (Plant Number: 04-01-002).

Daily recordkeeping/calculations for single HAP emissions from all printing operations at the facility shall continue until the rolling 12-month total amount of single HAP emissions drops

below 7.0 tons on the last day of a month. Monthly calculation of single HAP emissions will then begin in the following month.

- v. If the rolling, 12-month total HAP emissions from all printing operations at the facility (Plant Number: 04-01-002) exceed 18.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
  - a. The total HAP emissions (tons) from all printing operations at the facility (Plant Number: 04-01-002); and,
  - b. The rolling 365-day total HAP emissions from all printing operations at the facility (Plant Number: 04-01-002).

Daily recordkeeping/calculations for total HAP emissions from all printing operations at the facility shall continue until the rolling 12-month total amount of total HAP emissions drops below 18.0 tons on the last day of a month. Monthly calculation of total HAP emissions will then begin in the following month.

- D. The owner or operator may take credit for any waste HAP or VOC shipped off-site. The owner or operator shall record the amount of waste shipped offsite. Based on the analysis of representative samples (as defined in 40 CFR 260.10) of the waste sent off-site the owner or operator may calculate an average twelve-month rolling HAP or VOC credit for each container of waste generated. This waste HAP or VOC may be subtracted from the rolling total of HAP or VOC used for the printing operations on the date the waste is shipped off-site.

Authority for Requirement: DNR Construction Permits 16-A-385, 01-A-641-S5, 01-A-644-S2  
03-A-1207-S1, 01-A-641-S2, 01-A-646-S5

### **Additional Plant-Wide Emission Limits**

*The atmospheric emissions from the plant as a whole shall not exceed the following:*

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 249 TPY <sup>(1)</sup>

Authority for Requirement: Limit Requested by Facility  
567 IAC 22.108(14)

<sup>(1)</sup>Total VOC emissions from all emission sources at this facility. The limit was initially requested in a letter from Steven E. McDowell, Curwood Inc. Responsible Official, dated February 08, 2007, and received February 09, 2007. The facility requested the limit in conjunction with Title V permit renewal in an email from Robert K Harmon, Bemis Company, Inc. Responsible Official, dated September 12, 2017. During the fourth renewal process, the facility requested the limit be included in the permit.

### **Operating Condition Monitoring**

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. A listing of all sources that emit VOCs.
- B. A daily log showing all materials (paint, thinners, solvents, inks, glues, etc.) used daily by the facility, the amount of material used, and the VOC content of those materials. Included in

the log shall be copies of all purchasing records for all materials and the corresponding Safety Data Sheets (SDS).

- C. The owner or operator shall determine the annual facility-wide VOC emissions. The owner or operator shall calculate a rolling twelve-month total for VOC emissions at the facility (Plant Number: 04-01-002) until the VOC emissions exceed 180.0 tons per year. At this point the owner or operator shall immediately begin keeping 365-day rolling total of the VOC emissions from the entire facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total of VOC is returned to below 180.0 tons.
- D. Hazardous Waste Manifests shall be kept for any credits that the facility wants to take on VOCs that are not emitted into the air.

Authority for Requirement: 567 IAC 22.108(14)

### **Emission Limits**

*Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:*

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent

the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

### III. Emission Point-Specific Conditions

Facility Name: Amcor Flexibles North America, Inc.  
 Permit Number: 01-TV-001R4

#### Emission Point ID Number: See Table: Uncontrolled Presses & Ovens

#### Associated Equipment

Associated Emission Unit ID Number: See Table: Uncontrolled Presses & Ovens

**Table: Uncontrolled Presses & Ovens**

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Construction Permit Number	Emission Unit Design Rate / Raw Material
56	P10BP	Press 10 & Press Cleanup	01-A-643-S2	193 lbs ink & solvent/hr
	P10A	Press 10 Oven Bypass		1.2 MMBtu/hr natural gas
57	P11BP	Press 11 & Press Cleanup	01-A-644-S2	213.30 lbs ink & solvent/hr
	P11A	Press 11 Oven Bypass		2.0 MMBtu/hr natural gas
81	P14	Press 14 Oxidizer Bypass	03-A-1207-S1	339.20 lbs ink & solvent/hr
75	P15	Press 15	01-A-647-S2	142.20 lbs ink & solvent/hr
	P15A	Press 15 Oven Bypass		0.8 MMBtu/hr natural gas
77	P16BP	Press 16 Oven Bypass	01-A-646-S5	142.20 lbs ink & solvent/hr
	P16A	Press 16		0.8 MMBtu/hr natural gas
90	P17	Press 17 Bypass Stack	16-A-385	320 lb VOC/hr

Press 14 Oven is electric and is therefore not included in the Title V Operating Permit

### Applicable Requirements

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits in Table 1: Uncontrolled Presses & Ovens, except 16-A-385  
 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits in Table 1: Uncontrolled Presses & Ovens, except 16-A-385  
567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

### **Operational Limits & Requirements For EP 56, 57, 81, 75, and 77**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

- A. See Plant-Wide Operating Condition Monitoring Sections A and B on pages 9-10.

The following applies to Presses 10, 11, 14, 15 and 16

- A. When the owner or operator is applying solvent based inks or coatings on these processes the thermal oxidizer should be in operation and the captured VOC and HAP emissions vented through the thermal oxidizer. In the event of accident, malfunction or upset conditions that prevents the thermal oxidizer from operating, or whenever water based inks or coatings are being applied, then emissions from these processes may be emitted via the bypass stacks. All VOC and HAP emissions from the bypass stacks shall be accounted for.

Authority for Requirement: DNR Construction Permits in Table 1: Uncontrolled Presses & Ovens, except 16-A-385

### **Operating Requirements and Associated Recordkeeping for EP 90**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.*

- A. The owner or operator shall maintain daily records that show the identity, quantity, single and total HAP content, and VOC content of each printing ink, coating and solvent used per process.

B. Total VOC emissions from all printing inks, coatings and solvents used in all printing and plate making operations at this facility (Plant Number: 04-01-002) shall not exceed 240.00 tons per twelve-month period.

- i. The owner or operator shall calculate and record the VOC emissions from this emission point each month.
- ii. The owner or operator shall use an overall control efficiency of 60% for presses 10 and 11 and an overall control efficiency of 81% for presses 14, 15, 16, and 17.
- iii. A different overall control efficiency may be used if that overall control efficiency has been verified by stack testing data that was approved by the Department.
- iv. If the rolling, 12-month total VOC emissions from all printing and plate making operations at the facility (Plant Number: 04-01-002) exceed 180.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
  - a. The total emissions of VOC (tons) from all printing and plate making operations at the facility (Plant Number: 04-01-002); and,
  - b. The rolling 365-day total amount of VOC emissions from all printing and plate making operations at the facility (Plant Number: 04-01-002).

Daily recordkeeping/calculations for VOC emissions from all printing and plate making operations at the facility shall continue until the rolling 12-month total amount of VOC emissions drops below 180.0 tons on the last day of a month. Monthly calculation of VOC emissions will then begin in the following month.

C. Single and total HAP emissions from this facility (Plant Number: 04-01-002) shall not exceed 9.4 and 24.4 tons per twelve-month period respectively.

- i. The owner or operator shall calculate and record single HAP and total HAP emissions from this emission point each month.
- ii. The owner or operator shall use an overall control efficiency of 60% for presses 10 and 11 and an overall control efficiency of 81% for presses 14, 15, 16, and 17.
- iii. A different overall control efficiency may be used if that overall control efficiency has been verified by stack testing data that was approved by the Department.
- iv. If the rolling, 12-month total emissions of any single HAP from all printing and plate making operations at the facility (Plant Number: 04-01-002) exceed 7.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
  - a. The total emissions of any single HAP (tons) from all printing and plate making operations at the facility (Plant Number: 04-01-002); and,
  - b. The rolling 365-day total amount of single HAP emissions from all printing and plate making operations at the facility (Plant Number: 04-01-002).

Daily recordkeeping/calculations for single HAP emissions from all printing and plate making operations at the facility shall continue until the rolling 12-month total amount of single HAP emissions drops below 7.0 tons on the last day of a month. Monthly calculation of single HAP emissions will then begin in the following month.

- v. If the rolling, 12-month total HAP emissions from all printing and plate making operations at the facility (Plant Number: 04-01-002) exceed 18.0 tons per 12-month rolling period, the facility shall maintain the following daily records:
  - a. The total HAP emissions (tons) from all printing and plate making operations at the facility (Plant Number: 04-01-002); and,

- b. The rolling 365-day total HAP emissions from all printing and plate making operations at the facility (Plant Number: 04-01-002).

Daily recordkeeping/calculations for total HAP emissions from all printing and plate making operations at the facility shall continue until the rolling 12-month total amount of total HAP emissions drops below 18.0 tons on the last day of a month. Monthly calculation of total HAP emissions will then begin in the following month.

- D. The owner or operator may take credit for any waste HAP or VOC shipped off-site. The owner or operator shall record the amount of waste shipped offsite. Based on the analysis of representative samples (as defined in 40 CFR 260.10) of the waste sent off-site the owner or operator may calculate an average twelve-month rolling HAP or VOC credit for each container of waste generated. This waste HAP or VOC may be subtracted from the rolling total of HAP or VOC used for the printing and plate making operations on the date the waste is shipped off-site.
- E. The maximum amount of ink applied in this press, Press 17, shall not exceed 546 lb/hr on a calendar day average.
- F. The permittee shall maintain the following daily records:
  - i. The date, the amount of ink applied, and the number of hours that the press, Press 17, operated for that day;
  - ii. A determination of the average amount of ink applied based upon the amount of ink used divided by the number of hours the press was in operation that day.
- G. The press, Press 17, shall be contained in a permanent total enclosure meeting the criteria found in Appendix M to 40 CFR Part 51, METHOD 204—CRITERIA FOR AND VERIFICATION OF A PERMANENT OR TEMPORARY TOTAL ENCLOSURE.

Authority for Requirement: DNR Construction Permit 16-A-385

**Emission Point Characteristics**

*These emission points shall conform to the conditions listed in the table below.*

<b>Emission Point</b>	<b>Stack Height (feet)</b>	<b>Stack Opening (inches)</b>	<b>Stack Exhaust Flow Rate (scfm)</b>	<b>Stack Temperature (°F)</b>	<b>Discharge Style</b>	<b>Authority for Requirement</b>
56	42	16 x 16	4,600	110	Vertical unobstructed	01-A-643-S2
57	42	16 x 16	4,600	110	Vertical unobstructed	01-A-644-S2
81	42	16 x 16	4600	110	Vertical unobstructed	03-A-1207-S1
75	42	14 x 14	1900	110	Vertical unobstructed	01-A-647-S2
77	42	20 x 20	2000	110	Vertical unobstructed	01-A-646-S5
90	36	16 x 14.375	8,500	110	Vertical unobstructed	16-A-385

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator

shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: EP 74**

Associated Equipment

Emissions Control Equipment ID Number: RTO1

Emissions Control Equipment Description: Thermal Oxidizer (Natural Gas, 4.87 MMBtu/hr)

Emission Point	Emission Unit	EU Description	Rated Capacity	Construction Permit Number
74	P10	Press 10	60,000 feet/hour	01-A-641-S5
	P10A	Press 10 Oven	1.2 MMBtu/hr	
	P11	Press 11	60,000 feet/hour	
	P11A	Press 11 Oven	2.0 MMBtu/hr	
	P14	Press 14	60,000 feet/hour	
	P15	Press 15	48,000 feet/hour	
	P15A	Press 15 Oven	0.8 MMBtu/hr	
	P16	Press 16	48,000 feet/hour	
	P16A	Press 16 Oven	0.8 MMBtu/hr	
	P17	Press 17	320 lb VOC/hr	

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 01-A-641-S5  
567 IAC 23.3(2)"d"

- <sup>(1)</sup> An exceedance of the indicator opacity of "No Visible Emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 2.1 lb/hr

Authority for Requirement: DNR Construction Permit 01-A-641-S5  
567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)  
Emission Limit(s): 500 ppm  
Authority for Requirement: DNR Construction Permit 01-A-641-S5  
567 IAC 23.3(3)"e"

Pollutant: Single HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

### **Operating Requirements and Associated Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.*

- A. Plant Wide Conditions, Operating Condition Monitoring conditions A – D.
- B. This oxidizer shall operate at all times presses 10, 11, 14, 15, 16, and/or 17 are operating. In the event of accident, malfunction or an upset condition that prevents the thermal oxidizer from operating, or whenever water based inks or coatings are being applied, then emissions may be vented by the associated bypass stack.
  - i. The temperature in the combustion zone of this thermal oxidizer shall be maintained between 1,400 °F and 1,950 °F whenever process exhaust is being directed to the oxidizer.
  - ii. Whenever process exhaust is being directed to the oxidizer, the owner or operator shall record the combustion zone temperature of the thermal oxidizer at least once every fifteen minutes.
- C. The control equipment, CE RTO1, shall be operated and maintained according to the manufacturer's specification with inspections occurring at a minimum of once per calendar year.
- D. A log of all maintenance and inspection activities performed on the control equipment, CE RTO1. This log shall include, but is not limited to:
  - i. The date and time any inspection and/or maintenance was performed on the emission unit and/or control equipment;
  - ii. Any issue(s) identified during the inspection and the date each issue(s) was resolved; and,
  - iii. Any issue(s) addressed during the maintenance activities and the date each issue(s) was resolved.

Authority for Requirement: DNR Construction Permit 01-A-641-S5

**Emission Point Characteristics**

*This emission point shall conform to the conditions listed below.*

Stack Height (feet): 50

Stack Opening (inches, diameter): 42

Stack Exhaust Flow Rate (scfm): 25,000

Stack Temperature (°F): 225

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 01-A-641-S5

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

The CAM plan for the controlled printing presses includes capture efficiency and controlling emissions through the use of a thermal oxidizer. The CAM plan begins on the following page of this permit. The CAM plan requirement is not based on the emissions from the thermal oxidizer. The CAM plan is in effect to assure the capture efficiency of the system and the destruction efficiency of the thermal oxidizer is operating in a manner to meet the federally enforceable VOC emission limitations imposed upon this facility.

Authority for Requirement: 567 IAC 22.108(3)

**Amcor Flexibles North America, Inc. – Centerville, IA**  
**Compliance Assurance Monitoring (CAM) Plan**  
(Revised 08/24/22)

**Unenclosed Presses**

I. Monitoring Approach For Unenclosed Presses (Presses 14, 15, and 16).

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the operational condition of the control device bypass damper and the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks including: bypass damper position.	Use a smoke stick or equivalent approach to assure the dryer is negative with respect to the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper or the exhaust system ductwork has been compromised.	An excursion is identified as any finding that any interlock is inoperative.	General overall flow of smoke should be into the dryer web slot or application capture area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Process can not be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak-free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the process will be shut down if the bypass damper is open to atmosphere.	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application capture area.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Not applicable.
D. Monitoring Frequency	Semiannually	Annually	Whenever the location of a between color dryer is disrupted. (This may not be necessary for two piece dryers.)

	Indicator #1	Indicator #2	Indicator # 3
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Not applicable.
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

## II. Rationale for Selection of Performance Indicators

Unenclosed presses are designed with a capture system for the application area and dryers which operate under negative pressure. The capture, dryer and exhaust system and the airflow through the system are part of the process designed by the manufacturer. Once installed and tested, it does not change. A properly balanced air system must be maintained in order to meet fire insurance requirements.

Monitoring the operation of the bypass damper interlock and integrity of the exhaust system between the process and the control device will assure that the process is exhausting all captured emissions to the control device. Bypass dampers on the system are electronically interlocked to assure the process exhaust stream is directed to the oxidation system during operation. Inspections of the ductwork and damper interlocks will ensure their integrity.

When necessary after equipment maintenance, or adjustment, a smoke test will verify capture (negative flow from the atmosphere into the exhaust system) at the test location.

## III. Rationale for Selection of Indicator Ranges

A performance test is conducted on the dryer and exhaust system when first installed to demonstrate compliance with the capture efficiency required in the air pollution permit or as guaranteed by the manufacturer.

The level at which the low-flow sensor interlock activates is established by the manufacturer at the time of installation. It is set at a level to assure proper operation of the process. Maintaining airflow above this level assures the process is properly operating and provides a reasonable assurance the capture efficiency is being maintained.

**Permanent Total Enclosure (PTE)**

I. Monitoring Approach For Permanent Total Enclosures Utilizing Pressure Differential (Press 17).

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure have been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than (-)0.007” w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007” w.c. can be used as the indicator if such differential is demonstrated as adequate to qualify the permanent total enclosure with Method 204 criteria.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.

	Indicator #1	Indicator #2	Indicator # 3
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instruction.
D. Monitoring Frequency	Semiannually	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

## II. Rationale for Selection of Performance Indicators

Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

## III. Rationale for Selection of Indicator Ranges

The selected indicator range is a differential pressure of less than -0.007 in. w.c. This indicator range is based upon Method 204 criteria. A differential pressure of -0.007 in. w.c. is considered equivalent to a face velocity of 200 ft/minute for natural draft openings. Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

## Regenerative Thermal Oxidizer

### I. Monitoring Approach for Regenerative Thermal Oxidizers

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	An excursion is identified as a temperature measurement less than 1400 degrees or greater than 1950 degrees F.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 0.5% of temperature measured or $\pm 5^{\circ}\text{F}$ , whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDNR prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$ .	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	<ul style="list-style-type: none"> <li>• External inspection – monthly.</li> <li>• Internal inspection – annually.</li> </ul>	Once during the permit term.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.

	Indicator #1	Indicator #2	Indicator #3
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDNR 30 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Semiannually.	Semiannually.	For each performance test conducted.

## II. Rationale for Selection of Performance Indicators

The oxidizer combustion zone temperature was selected because it is indicative of a regenerative thermal oxidizer's operation. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected. If the combustion zone temperature decreases significantly, complete combustion may not occur.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once during the permit term to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

## III. Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer combustion zone temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The oxidizer includes a temperature controller that maintains the desired combustion zone temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

**Emission Point ID Number: See Table: Film Treater**

Associated Equipment

Associated Emission Unit ID Number: See Table: Film Treater

**Table: Film Treater**

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Construction Permit Number	Rated Capacity/Raw Material (kW/hr of Electricity)	Emissions Control Equipment (CE) ID Number	Emissions Control Equipment Description
55	P10C	Press 10 Corona Treater	96-A-352-S4	4.0	NA	NA
58	P11C	Press 11 Corona Treater	93-A-376-S5	4.0		
69	EBCU5	Electron Beam Curing Unit 5	00-A-1180-S6	N/A		
70	TRETL	Film Treater – Large	00-A-1181-S4	6.0	CE Nitrogen	Nitrogen Blanket
78	P16C	Press 16 Corona Treater	01-A-648-S2	2.5	N/A	N/A
82	P14C	Press 14 Corona Treater	03-A-1208	4.0		
83	P14C2	Press 14 Corona Treater 2	03-A-1209	3.0		
76	P15C	Press 15 Corona Treater	01-A-649-S1	2.5		
91	P17C	Press 17 Corona Treater	16-A-384-S1	16.0	OD2	Ozone Decomposer

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

EP-91:

Pollutant: Ozone (O<sub>3</sub>)

Emission Limits: 0.12 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-384-S1

EP-69:

Pollutant: Ozone (O<sub>3</sub>)

Emission Limits: 0.69 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-1180-S6

EP-70:

Pollutant: Ozone (O<sub>3</sub>)

Emission Limits: 0.005 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-1181-S4

For EP-55, EP-58, EP-78, EP-82, EP-83. EP-76

None at this time.

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.*

**Operating Requirements and Associated Recordkeeping**

EP-70:

- A. The owner or operator shall maintain a nitrogen blanket over this unit whenever the unit is in operation.
- B. The facility shall maintain a log of all maintenance and inspection activities performed on the control equipment, CE Nitrogen. This log shall include, but is not limited to:
  - i. The date and time any inspection and/or maintenance was performed on the emission unit and/or control equipment;
  - ii. Any issue(s) identified during the inspection and the date each issue(s) was resolved; and,
  - iii. Any issue(s) addressed during the maintenance activities and the date each issue(s) was resolved.

Authority for Requirement: DNR Construction Permit 00-A-1181-S4

EP-91:

- A. The control equipment (ozone decomposer), CE OD2, shall be operated and maintained according to the manufacturer’s specification with inspections occurring at a minimum of once per calendar year.
- B. The facility shall maintain a log of all maintenance and inspection activities performed on the control equipment, CE OD2. This log shall include, but is not limited to:
  - i. The date and time any inspection and/or maintenance was performed on the emission unit and/or control equipment;
  - ii. Any issue(s) identified during the inspection and the date each issue(s) was resolved; and,
  - iii. Any issue(s) addressed during the maintenance activities and the date each issue(s) was resolved.

Authority for Requirement: DNR Construction Permit 16-A-384-S1

EP-55, EP-58, EP-69, EP-78, EP-82, EP-83. EP-76

- A. There are no operating requirements for this emission unit at this time.

**Emission Point Characteristics**

*These emission points shall conform to the conditions listed in the table below.*

<b>Emission Point</b>	<b>Stack Height (feet from the ground)</b>	<b>Stack Outlet Dimensions (inches)</b>	<b>Exhaust Flow Rate</b>	<b>Exhaust Temp. (°F)</b>	<b>Discharge Style</b>	<b>Authority For Requirement</b>
55	47	8	1,000 (scfm)	85	Vertical unobstructed	96-A-352-S4
58	47	8	1,000 (scfm)	85	Vertical unobstructed	93-A-376-S5
69	47	18	2,400 (scfm)	75	Vertical unobstructed	00-A-1180-S6
70	56	12	2,400 (scfm)	75	Vertical unobstructed	00-A-1181-S4
78	48	8	250 (scfm)	85	Vertical unobstructed	01-A-648-S2
82	47	10	800 (scfm)	85	Vertical unobstructed	03-A-1208
83	47	8	500 (scfm)	85	Vertical unobstructed	03-A-1209
76	48	8	250 (acfm)	85	Vertical unobstructed	01-A-649-S1
91	47	17	2,000 (acfm)	100	Vertical unobstructed	16-A-384-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: 63**

### Associated Equipment

Associated Emission Unit ID Numbers: INKMIX

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Emission Unit vented through this Emission Point: INKMIX

Emission Unit Description: Ink Mix and Storage Room

Raw Material/Fuel: Ink

Rated Capacity: 0.276 tons/hr

### Applicable Requirements

#### **Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

#### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

There are no operational limits or reporting/ recordkeeping requirements for this emission point.

**Emission Point Characteristics**

*This emission point shall conform to the conditions listed below.*

Stack Height (feet): 48

Stack Opening (inches, diameter): 22

Stack Exhaust Flow Rate (scfm): 7,000

Stack Temperature (°F): Ambient

Discharge Style: Vertical without rain cap or with unobstructing rain cap

Authority for Requirement: DNR Construction Permit 01-A-650

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: See Table - BOILERS**

Associated Equipment

Associated Emission Unit ID Number: See Table: Boilers

**Table: Boilers**

<b>Emission Point Number</b>	<b>Associated Emission Unit Number</b>	<b>Associated Emission Unit Description</b>	<b>Emission Unit Design Rate / Raw Material</b>
65	B1	Boiler 1 Natural Gas	18.7 MMBtu/hr from Natural Gas or Distillate Fuel
66	B2	Boiler 2 Natural Gas	18.7 MMBtu/hr from Natural Gas or Distillate Fuel

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limits: 40%

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.8 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(1)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) (using Distillate Fuel)

Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) (using Natural Gas)

Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

Process throughput:

- A. No person shall allow, cause or permit the combustion of number 1 or number 2 fuel oil exceeding a sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

To avoid being subject to 40 CFR 63 subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources), these boilers may burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours (for each boiler) during any calendar year.

Authority for Requirement: 40 CFR 63 Subpart JJJJJ

Reporting & Record keeping:

All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.

- A. The facility shall monitor the percent of sulfur by weight in the fuel oil as delivered. The documentation may be vendor supplied or facility generated.

Authority for Requirement: 567 IAC 22.108(3)

- B. See section II. Plant-Wide Conditions, Operating Condition Monitoring

Authority for Requirement: 567 IAC 22.108(14)

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: 73**

### Associated Equipment

Associated Emission Unit ID Numbers: PAINT  
Emissions Control Equipment ID Number: 1  
Emissions Control Equipment Description: Fiberglass Filter Pad

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Emission Unit vented through this Emission Point: PAINT  
Emission Unit Description: Maintenance Paint Booth  
Raw Material/Fuel: Paint  
Rated Capacity: 4 Cans/hr

### **Applicable Requirements**

#### **Emission Limits (lb./hr, gr./dscf, lb./MMBtu/hr, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity  
Emission Limit(s): 40 %  
Authority for Requirement: DNR Construction Permit 96-A-576-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)  
Emission Limit(s): 0.01 gr/dscf  
Authority for Requirement: DNR Construction Permit 96-A-576-S3  
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): 1.0 tons/yr  
Authority for Requirement: DNR Construction Permit 96-A-576-S3

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

Process throughput:

- A. No more than 1800 cans of spray paint shall be used in this booth per twelve-month rolling total.

Reporting & Record keeping:

All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.

- A. Record the number of cans of spray paint used per twelve-month rolling total.

Authority for Requirement: DNR Construction Permit 96-A-576-S3

- A. See Section II. Plant-Wide Conditions, Operating Condition Monitoring

### **Emission Point Characteristics**

*This emission point shall conform to the conditions listed below.*

Stack Height (feet): 56

Stack Opening (inches, diameter): 16

Stack Exhaust Flow Rate (scfm): 2,200

Stack Temperature (°F): Ambient

Discharge Style: Vertical without rain cap or with unobstructing rain cap

Authority for Requirement: DNR Construction Permit 96-A-576-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Dry Filter Agency Operation and Maintenance Plan**

**Weekly**

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: See Table: Extruders

### Associated Equipment

Associated Emission Unit ID Number: See Table: Extruders

**Table: Extruders**

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Emission Unit Design Rate / Raw Material
EP F3	COEXB7	PE/PVDC Co-Extruder B7	140 lb/hr. of resin
	COEXB8	PE/PVDC Co-Extruder B8	140 lb/hr. of resin
	COEXB10	PE/PVDC Co-Extruder B10	200 lb/hr. of resin
	COEXB11	PE/PVDC Co-Extruder B11	150 lb/hr. of resin
	COEXB12	PE/PVDC Co-Extruder B12	150 lb/hr. of resin
	COEXB13	PE/PVDC Co-Extruder B13	150 lb/hr. of resin
	COEXB14	PE/PVDC Co-Extruder B14	240 lb/hr. of resin
	COEXB15	PE/PVDC Co-Extruder B15	240 lb/hr. of resin
	COEXB16	PE/PVDC Co-Extruder B16	240 lb/hr. of resin
	COEXB17	PE/PVDC Co-Extruder B17	240 lb/hr. of resin
COEXB18	PE/PVDC Co-Extruder B18	200 lb/hr. of resin	

### **Applicable Requirements**

#### **Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

#### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

See Section II. Plant-Wide Conditions, Operating Condition Monitoring

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: EP F4

### Associated Equipment

Associated Emission Unit ID Number: See Table: Heaters

**Table: Heaters**

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Emission Unit Design Rate / Raw Material
EP F4	5HEAT1	Bldg 5 Space Heater 1	0.3 MMBtu/hr. natural gas
	5HEAT2	Bldg 5 Space Heater 2	0.3 MMBtu/hr. natural gas
	5HEAT3	Bldg 5 Space Heater 3	0.3 MMBtu/hr. natural gas
	5HEAT4	Bldg 5 Space Heater 4	0.3 MMBtu/hr. natural gas
	5AHEAT1	Bldg 5A Space Heater 1	0.13 MMBtu/hr. natural gas
	5AHEAT2	Bldg 5A Space Heater 2	0.13 MMBtu/hr. natural gas
	7AHEAT1	Bldg 7A Space Heater 1	0.8 MMBtu/hr. natural gas
	33HEAT1	Bldg 33 Space Heater 1	2.376 MMBtu/hr. natural gas
	34HEAT1	Bldg 34 Space Heater 1	0.25 MMBtu/hr. natural gas

### Applicable Requirements

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 2.1 lb/hr

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppm

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

See Section II. Plant-Wide Conditions, Operating Condition Monitoring

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: EP F5**

Associated Equipment

Associated Emission Unit ID Numbers: PRTWSH

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Emission Unit vented through this Emission Point: PRTWSH  
Emission Unit Description: SafetyKleen Parts Washer  
Raw Material/Fuel: Solvent  
Rated Capacity: 0.02 lbs/hr

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

See Section II. Plant-Wide Conditions, Operating Condition Monitoring

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: See Table: Storage Silos**

**Associated Equipment**

Associated Emission Unit ID Number: See Table: Storage Silos

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**Table: Storage Silos**

<b>Emission Point Number</b>	<b>Associated Emission Unit Number</b>	<b>Associated Emission Unit Description</b>	<b>Construction Permit Number</b>	<b>Emission Unit Capacity / Raw Material</b>
FS4	PESIL04	Silo #4	03-A-1210	200,000 lbs/PVC pellets
FS5	PESIL05	Silo #5	03-A-1211	200,000 lbs/PVC pellets
FS6	PESIL06	Silo #6	03-A-1212	200,000 lbs/PVC pellets
FS7	PESIL07	Silo #7	03-A-1213	400,000 lbs/PVC pellets

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits in Table: Storage Silos  
567 IAC 23.3(2)"d"

- <sup>(1)</sup> An exceedance of the indicator opacity of (25%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits in Table: Storage Silos  
567 IAC 23.3(2)"a"

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

None at this time.

**Emission Point Characteristics**

*These emission points shall conform to the conditions listed in the table below.*

<b>Emission Point Number</b>	<b>Stack Height (feet)</b>	<b>Stack Opening (inches)</b>	<b>Stack Exhaust Flow Rate</b>	<b>Stack Temperature (°F)</b>	<b>Discharge Style</b>	<b>Authority For Requirement</b>
FS4	67	20 x 20	Displacement Air	Ambient	Horizontal	03-A-1210
FS5	67	20 x 20	Displacement Air	Ambient	Horizontal	03-A-1211
FS6	67	20 x 20	Displacement Air	Ambient	Horizontal	03-A-1212
FS7	60	19 x 19	Displacement Air	Ambient	Horizontal	03-A-1213

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: EP 85**

Associated Equipment

Associated Emission Unit ID Numbers: FINCLEAN

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Emission Unit vented through this Emission Point: FINCLEAN  
Emission Unit Description: Ink Staging & Parts Cleaning  
Raw Material/Fuel: Ink and Solvent  
Rated Capacity: 0.143 lb VOC/ hr

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
Emission Limit(s): See Plant Wide Conditions  
Authority for Requirement: See Plant Wide Conditions

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

See Section II. Plant-Wide Conditions, Operating Condition Monitoring

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: See Table: Shrink Extruders**

Associated Equipment

Associated Emission Unit ID Number: See Table: Shrink Extruders

**Table: Shrink Extruders**

<b>Emission Point Number</b>	<b>Associated Emission Unit Number</b>	<b>Associated Emission Unit Description</b>	<b>Emission Unit Design Rate / Raw Material</b>
F8	COEXB19	Shrink Extruder B19	150 lb/hr
	COEXB20	Shrink Extruder B20	150 lb/hr
	COEXB21	Shrink Extruder B21	150 lb/hr
	COEXB22	Shrink Extruder B22	150 lb/hr

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 12-A-522-S1

<sup>(1)</sup> An exceedance of the indicator opacity of ‘No Visible Emissions’ will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)

Emission Limit(s): See Plant Wide Conditions

Authority for Requirement: See Plant Wide Conditions

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. These records shall demonstrate compliance with all applicable operating limits. Records shall be legible and maintained in an orderly manner.*

- A. Total VOC emissions from all printing inks, coatings and solvents used in all printing operations at this facility (Facility ID: 04-01-002) shall not exceed 240.00 tons per twelve-month period. Single and total HAP emissions from this facility (Facility ID: 04-01-002) shall not exceed 9.4 and 24.4 tons per twelve-month period respectively.
- i. The owner or operator shall maintain records on the identification of the resin used in this emission unit. The owner or operator shall maintain daily records that show the identity, quantity and VOC content of each printing ink, coating and solvent used per process.
  - ii. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of waste shipped offsite. Based on the analysis of representative samples (as defined in 40 CFR 260.10) of the waste sent off-site the owner or operator may calculate an average twelve-month rolling VOC credit for each container of waste generated. This waste VOC may be subtracted from the rolling total of VOC used for the printing operations on the date the waste is shipped off-site.
  - iii. The owner or operator shall record the VOC emissions from this process each month. The owner or operator shall calculate the rolling twelve-month total amount of VOC emissions from all printing operations at the facility (Facility ID: 04-01-002). If the VOC emissions exceed 180.0 tons per rolling 12-month period, the owner or operator shall immediately begin tracking VOC emissions on a rolling 365-day basis. The tracking and recordkeeping requirements shall revert back to a rolling 12-month basis if the rolling 365-day total amount of VOC is below 180.0 tons.
  - iv. The owner or operator shall record the single and total HAP emissions from these shrink extruders (EU-COEXB19, EU-COEXB20, EU-COEXB21, and EU-COEXB22) each month. The owner or operator shall calculate the rolling 12-month total amount of single and total HAP emissions from all printing operations at the facility (Facility ID: 04-01-002). If the single HAP emissions exceed 7.0 tons per rolling 12-month period or the total HAP emissions exceed 18.0 tons per rolling 12-month period, the owner or operator shall immediately begin tracking HAP emissions on a rolling 365-day rolling basis. The tracking and recordkeeping requirements shall revert back to a rolling 12-month basis if the rolling 365-day total amount of HAP is below 7.0 tons of single HAP and 18.0 tons of total HAP.

Authority for Requirement: DNR Construction Permit 12-A-522-S1

**Emission Point Characteristics**

*This emission point shall conform to the conditions listed below.*

Stack Height (feet from ground): NA  
Stack Opening (inches, diameter): NA  
Stack Exhaust Flow Rate (scfm): NA  
Stack Temperature (°F): NA  
Discharge Style: Vents Inside  
Authority for Requirement: DNR Construction Permit 12-A-522-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Numbers: EP 93 & EP 94

### Associated Equipment

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Construction Permit Number	Emission Unit Capacity / Raw Material	Emissions Control Equipment (CE) ID Number	Emissions Control Equipment Description
EP 93	BM91	Bag Machine 91 Corona Treater	20-A-168-S1	85 m/min Polymer Film	CE OD91	Ozone Decomposer
EP 94	BM92	Bag Machine 92 Corona Treater	20-A-169-S1	85 m/min Polymer Film	CE OD92	Ozone Decomposer
EP 95	BM93	Bag Machine 93 Corona Treater	20-A-170-S1	85 m/min Polymer Film	CE OD93	Ozone Decomposer

### Applicable Requirements

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Ozone

Emission Limit(s): 0.41 lb/hr

Authority for Requirement: DNR Construction Permits 20-A-168-S1, 20-A-169-S1, and 20-A-170-S1

#### Operational Limits & Reporting/Record keeping Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

- A. The owner or operator shall operate and maintain the control equipment (CE OD91, CE OD92, and CE OD93) according to manufacturer specifications and the manufacturer's maintenance schedule. The owner or operator shall:
  - i. Maintain a record of all inspections and maintenance and any actions resulting from the inspections and maintenance for all the control equipment (CE OD91, CE OD92, and CE OD93).

Authority for Requirement: DNR Construction Permits 20-A-168-S1, 20-A-169-S1, And 20-A-170-S1

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height (feet from ground): 33.5

Stack Opening (inches, diameter): 7.9

Stack Exhaust Flow Rate (scfm): 895

Stack Temperature (°F): 95

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 20-A-168-S1, 20-A-169-S1, and 20-A-170-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: FINA (Finishing Area)**

Associated Equipment

<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
Bellmark A	Portable Press	N/A	Solvent in Ink	267 ft/min	N/A
Bellmark B	Portable Press		Solvent in Ink	267 ft/min	
Bellmark C	Portable Press		Solvent in Ink	267 ft/min	
Bellmark D	Portable Press		Solvent in Ink	267 ft/min	

**Applicable Requirements**

**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)  
 Emission Limit(s): See Plant Wide Conditions  
 Authority for Requirement: See Plant Wide Conditions

Pollutant: Single HAP (facility-wide)  
 Emission Limit(s): See Plant Wide Conditions  
 Authority for Requirement: See Plant Wide Conditions

Pollutant: Total HAP (facility-wide)  
 Emission Limit(s): See Plant Wide Conditions  
 Authority for Requirement: See Plant Wide Conditions

**Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

See Section II. Plant-Wide Emission Limits

Authority for Requirement: 567 IAC 22.108(14)

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

### G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"*

### G2. Permit Expiration

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

### G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

#### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

#### **G6. Annual Fee**

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

### **G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

### **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

### **G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

### **G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.
- g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)

2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

**G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

**G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

**G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

**G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a

violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

## 2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.

v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.

vi. The steps that were taken to limit the excess emission.

vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 22.108(16)*

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

#### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

## **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 - 22.144(455B));
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade
    - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
    - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
    - vii. Any permit term or condition no longer applicable as a result of the change.
2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

### **G18. Duty to Modify a Title V Permit**

#### **1. Administrative Amendment.**

- a. An administrative permit amendment is a permit revision that does any of the following:
  - i. Correct typographical errors
  - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - iii. Require more frequent monitoring or reporting by the permittee; or
  - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### **2. Minor Title V Permit Modification.**

- a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
  - i. Do not violate any applicable requirement;
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification under rule 567 - 22.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- ii. The permittee's suggested draft permit;
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

### 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.111-567 IAC 22.113*

#### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *567 IAC 22.1(1)*

#### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (*567 IAC 23.1(3)"a"*); training fires and controlled burning of a demolished building (*567 IAC 23.2*).

#### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

## **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

## **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle

has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a"*, *567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 22.114(3)*

#### **G25. Permit Shield**

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit; or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

#### **G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

#### **G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of *567 IAC 22.111(1)*. *567 IAC 22.111 (1)"d"*

#### **G29. Disclaimer**

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

### **G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau  
Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

*567 IAC 25.1(7)"a", 567 IAC 25.1(9)*

### **G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.

*567 IAC 26.1(1)*

**G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

**Field Office 1**

1101 Commercial Court, Suite 10  
Manchester, IA 52057  
(563) 927-2640

**Field Office 2**

2300-15th St., SW  
Mason City, IA 50401  
(641) 424-4073

**Field Office 3**

1900 N. Grand Ave.  
Spencer, IA 51301  
(712) 262-4177

**Field Office 4**

1401 Sunnyside Lane  
Atlantic, IA 50022  
(712) 243-1934

**Field Office 5**

Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-0268

**Field Office 6**

1023 West Madison Street  
Washington, IA 52353-1623  
(319) 653-2135

**Polk County Public Works Dept.**

Air Quality Division  
5885 NE 14th St.  
Des Moines, IA 50313  
(515) 286-3351

**Linn County Public Health**

Air Quality Branch  
1020 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000