

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**Color-Box, Richmond Division
1056 Industries Road
Richmond, Indiana 47374**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|---|----------------|
| Operation Permit No.: MSOP 177-10567-00063 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

C.11 Monitoring Methods [326 IAC 3]
SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary printing presses.

Authorized Individual: Frank Mazzei
Source Address: 1056 Industries Road, Richmond, Indiana 47374
Mailing Address: 623 South G Street, Richmond, Indiana 47374
Phone Number: (765) 966-7588
SIC Code: 2752
County Location: Wayne
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of 60 inches, each exhausting to stack ID # V1, V2 and V3, respectively.

SECTION B GENERAL CONSTRUCTION CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding Condition B.6, all requirements and conditions of this construction permit shall

remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emissions units were constructed as proposed in the application. The emissions units covered in the New Source Construction Permit may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Phase Construction Time Frame

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

- (a) Construction of Press #2 (Phase 2) has not begun within eighteen (18) months from the effective date of this permit or if during the construction of Press #1 (Phase 1), work is suspended for a continuous period of one (1) year or more; and
- (b) Construction of Press #3 (Phase 3) has not begun within eighteen (18) months from the effective date of this permit or if during the construction of Press #2 (Phase 2), work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

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

- (a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this

title or the conditions of this permit or any operating permit revisions;

- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to

reduce emissions during an air pollution episode.

- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

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

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.12 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three

(3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of 60 inches, each exhausting to stack ID # V1, V2 and V3, respectively.

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of VOC delivered to each of the applicators of the non-heatset web offset lithographic printing presses shall be less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification, from the non-heatset web offset lithographic printing presses that would increase in potential VOC emissions to more than 25.0 tons per year for each press, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1.1 before such change can occur.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

Quarterly Report

Company Name: Color-Box, Richmond Division
Location: 1056 Industries Road, Richmond, Indiana 47374
Permit No.: 177-10567-00063
Source: three (3) non-heatset offset lithographic printing presses
Pollutant: volatile organic compounds
Limit: Each of the three (3) non-heatset offset lithographic printing presses shall each use no more than 25 tons of VOC per 12 month period.

Year: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|----------------------|------------------------------|--------------------------|
| | VOC Usage This Month | VOC Usage Previous 11 Months | VOC Usage 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Color-Box, Richmond Division
623 South G Street
Richmond, Indiana 47374

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Color-Box, Richmond Division, 1056 Industries Road, Richmond, Indiana, 47374, has constructed the one (1) non-heatset offset lithographic printing press (Press #1) in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on January 21, 1999 and as permitted pursuant to **Minor Source Operating Permit No. 177-10567, Plant ID No. 177-00063** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Color-Box, Richmond Division
623 South G Street
Richmond, Indiana 47374

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Color-Box, Richmond Division, 1056 Industries Road, Richmond, Indiana, 47374, has constructed the one (1) non-heatset offset lithographic printing press (Press #2) in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on January 21, 1999 and as permitted pursuant to **Minor Source Operating Permit No. 177-10567, Plant ID No. 177-00063** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Color-Box, Richmond Division
623 South G Street
Richmond, Indiana 47374

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Color-Box, Richmond Division, 1056 Industries Road, Richmond, Indiana, 47374, has constructed the one (1) non-heatset offset lithographic printing press (Press #3) in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on January 21, 1999 and as permitted pursuant to **Minor Source Operating Permit No. 177-10567, Plant ID No. 177-00063** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: Color Box, Richmond Division
Source Location: 1056 Industries Road, Richmond, Indiana 47374
County: Wayne
SIC Code: 2752
Operation Permit No.: 177-10567-00063
Permit Reviewer: Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed an application from Color Box, Richmond Division relating to the operation of printing presses.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of 60 inches, each exhausting to stack ID # V1, V2 and V3, respectively.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|-------------------|---------------|-----------------|------------------|------------------|
| V1 | Printing Press #1 | 51 | 0.83 | 2000 | ambient |
| V2 | Printing Press #2 | 55 | 0.83 | 2000 | ambient |
| V3 | Printing Press #3 | 57 | 0.83 | 2000 | ambient |

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 21, 1999. Additional information was received on February 23, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 0.00 |
| PM-10 | 0.00 |
| SO ₂ | 0.00 |
| VOC | 68.18 |
| CO | 0.00 |
| NO _x | 0.00 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential To Emit (tons/year) |
|---------------|-------------------------------|
| Xylene | less than 10 |
| Glycol Ethers | less than 10 |
| Cumene | less than 10 |
| TOTAL | less than 25 |

(a) Potential to emit (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

| Process/facility | Limited Potential to Emit (tons/year) | | | | | | |
|-------------------|---------------------------------------|-------|-----------------|-------|----|-----------------|------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Printing Press #1 | | | | 22.73 | | | |
| Printing Press #2 | | | | 22.73 | | | |
| Printing Press #3 | | | | 22.73 | | | |

| | | | | | | | |
|-----------------|--|--|--|-------|--|--|--|
| Total Emissions | | | | 68.18 | | | |
|-----------------|--|--|--|-------|--|--|--|

County Attainment Status

The source is located in Wayne County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|------------------|--------------------|
| PM | 0.00 |
| PM10 | 0.00 |
| SO ₂ | 0.00 |
| VOC | 68.18 |
| CO | 0.00 |
| NO _x | 0.00 |
| Single HAP | 0.98 |
| Combination HAPs | 1.87 |

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) The three (3) non-heatset offset lithographic printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430,

Subpart QQ). The printing presses are not rotogravure printers.

- (b) The three (3) non-heatset offset lithographic printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820, Subpart KK). The source is not a major source for HAPs and the printing presses are not rotogravure or flexographic.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Wayne County and the potential to emit VOC is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The single and total HAP emissions are less than 10 and 25 tons per year, respectively.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Facilities existing as of January 1, 1980 and have potential VOC emissions of 25 tons per year or more and are not subject to any other 8 rules shall reduce VOC emissions using Best Available Control Technology (BACT). The three (3) non-heatset offset lithographic printing presses will each have potential to emit VOC of less than 25 tons per year and each can independently produce products. Therefore, the presses are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

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

The three (3) non-heatset offset lithographic printing presses are not subject to 326 IAC 8-5-5 (Graphic Arts Operation). This rule applies to packaging rotogravure, publication rotogravure and flexographic printing sources.

No other Article 8 rules apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate

compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5.

As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The three (3) printing presses do not have applicable compliance monitoring conditions.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, Page 2 of 2)

Conclusion

The construction and operation of these three (3) printing presses shall be subject to the conditions of the attached proposed **New Source Construction and Minor Source Operating Permit 177-10567-00063**.

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

Addendum to the
Technical Support Document for New Construction and
Minor Source Operating Permit

Source Name: Color-Box, Richmond Division
Source Location: 1056 Industries Road, Richmond, Indiana 47374
County: Wayne
Operation Permit No.: 177-10567-00063
SIC Code: 2752
Permit Reviewer: Yvette de los Angeles/EVP

On March 20, 1999, the Office of Air Management (OAM) had a notice published in the Palladium Item, Richmond, Indiana, stating that Color-Box, Richmond Division had applied for a construction permit to construct and operate three (3) non-heatset offset lithographic printing presses. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 15, 1999, Color-Box, Richmond Division submitted comments on the proposed New Construction and Minor Source Operating Permit. The summary of the comments and corresponding responses is as follows (changes in bold or strikeout for emphasis):

Comment 1

Please note the spelling of our company name. It should be spelled "Color-Box" instead of "Color Box" throughout the permit.

Response 1

The name of the company with the correct spelling will be changed throughout the permit.

Comment 2

Section B.6 of the permit (Page 4 of 14) states that if construction is completed in phases, a separate Affidavit of Construction must be submitted for each phase of construction. Since this permit is for 3 separate presses, they each will be installed separately and we would like to begin operation on each press separately. Press #1 (Phase 1) will be constructed immediately. Presses #2 and #3 (Phase 2 and 3) have plans for construction in May, 1999. We will sign and send a separate Affidavit of Construction for each of the 3 presses when each phase is complete. We will thereafter begin operation of each of the 3 presses independently once each affidavit has been signed.

Response 2

Since the presses will be constructed in phases, the Condition B.7 will be added and three (3) separate Affidavit of Construction Forms will be prepared for the three (3) non-heatset offset lithographic printing presses.

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

- (a) Construction of Press #2 (Phase 2) has not begun within eighteen (18) months from the effective date of this permit or if during the construction of Press #1 (Phase 1), work is suspended for a continuous period of one (1) year or more; and**
- (b) Construction of Press #3 (Phase 3) has not begun within eighteen (18) months from the effective date of this permit or if during the construction of Press #2 (Phase 2), work is suspended for a continuous period of one (1) year or more.**

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

Comment 3

Section C.12 of the permit (Page 8 of 14) requires that an annual emission statement be completed at our plant per the requirements of 326 IAC 2-6. 326 IAC 2-6 is not applicable to our plant since we are not located in any of the listed nonattainment counties and do not have potential emissions of any pollutant above 100 tons per year. Page 4 of 5 of the Technical Support Document also states the 326 IAC 2-6 does not apply to our operations. Please confirm whether we are or aren't required to complete an annual emissions statement.

Response 3

Condition C.12 has been removed since potential emissions of all criteria pollutant, are below 100 tons per year. The subsequent conditions have been renumbered accordingly.

~~C.12 Annual Emission Statement [326 IAC 2-6]~~

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
400 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the~~

~~private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1.1.~~

Comment 4

Page 14 of 14 of the permit includes a description of the form that we must fill out for our quarterly report. The description of the limit that we must comply with should be clarified by stating the following:

"Each of the three (3) non-heatset..."

Response 4

The Quarterly Report Form on Page 14 of 14 will be revised with the above change.

Upon further review, the OAM has decided to make the following changes to the New Construction and Minor Source Operating Permit (changes in bold or strikeout for emphasis):

Comment 1

Why does Section C.12 require an Annual Emission Statement when the potential to emit of VOC is less than 100 tons per year? The TSD, Page 4 of 5, references 326 IAC 2-6 under State Rule Applicability and talks about fee assessment, but the wrong permit model is being used for this permit if potential emissions are less than 100 tons per year.

Response 1

Section C.12 has been removed, as per comment # 3 from source, and Page 4 of 5 of the Technical Support Document has been revised as follows:

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Wayne County and the potential to emit VOC is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

~~The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.~~

Comment 2

Section D.1.1: Should we reword the sentence which begins "Any change...?" because of the following:

- (a) Aren't source-wide emissions already greater than 25 tons per year?
- (b) Has 326 IAC 2-1 now become 326 IAC 2-1.1?

Response 2

Section D.1.1 has been modified as follows:

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of VOC delivered to each of the applicators of the non-heatset web offset lithographic printing presses shall be less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification, from the non-heatset web offset lithographic printing presses that would increase in ~~source-wide~~ potential VOC emissions to more than 25.0 tons per year **for each press**, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1.1 before such change can occur.

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Color Box, Richmond Division
Address City IN Zip: 1056 Industries Road, Richmond, IN 47374
CP: 177-10567
Plt ID: 177-00063
Reviewer: Yvette de los Angeles/EVP
Date: 04/29/99

| THROUGHPUT | | | |
|---------------|-------------------------------|--------------------------|-------------------------|
| Press I.D. | MAXIMUM LINE SPEED (FEET/MIN) | MAXIMUM PRINT WIDTH (IN) | MMin ² /YEAR |
| Presses 1,2,3 | 263 | 60 | 99,338 |

| INK VOCS | | | | | |
|----------------------------------|--|--------------------|-------------|---|---------------------------|
| Ink Name Press Id | Maximum Coverage (lbs/MMin ²) | Weight % Volatiles | Flash Off % | Throughput (MMin ² /Year) | Emissions* (TONS/YEAR) |
| Ink Presses 1,2,3 | 2.31 | 9% | 100.00% | 99,338 | 10.21 |
| Aqueous Coating Presses 1,2,3 | 3.46 | 5% | 100.00% | 99,338 | 9.11 |
| Press Cleaning Presses 1,2,3 | 0.07 | 98% | 100.00% | 99,338 | 3.41 |

| | |
|-------------------------------------|---------------------|
| Total VOC Emission for each press = | 22.73 Ton/yr |
| TOTAL VOC EMISSIONS = | 68.18 Ton/yr |

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Color Box, Richmond Division
Address City IN Zip: 1056 Industries Road, Richmond, IN 47374
CP: 177-10567
Plt ID: 177-00063
Reviewer: Yvette de los Angeles/EVP
Date: 04/29/99

| Material | Maximum Printing Throughput (MMin ² /yr) | Maximum Coverage (lbs/MMin ²) | Weight % Xylene | Weight % Glycol Ethers | Weight % Cumene | Xylene Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) | Cumene Emissions (ton/yr) | Total HAP Emission (tons/yr) |
|---|---|---|-----------------|------------------------|-----------------|---------------------------|----------------------------------|---------------------------|------------------------------|
| Ink | 9,934 | 2.31 | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Aqueous Coating | 9,934 | 3.46 | 0.00% | 0.20% | 0.00% | 0.00 | 0.03 | 0.00 | 0.03 |
| Press Cleaning | 9,934 | 0.22 | 30.00% | 20.00% | 4.00% | 0.33 | 0.22 | 0.04 | 0.59 |
| Total State Potential Emissions for each press | | | | | | 0.33 | 0.25 | 0.04 | 0.62 |
| Total State Potential Emissions | | | | | | 0.98 | 0.76 | 0.13 | 1.87 |

METHODOLOGY

HAPS emission rate (tons/yr) = Maximum Throughput (MMin²/yr) * Maximum Coverage (lbs/MMin²) * Weight % HAP * (1ton/2000lbs)