

July 26, 2001

Ms. Tracy Guffey
Print Communications
2457 E. Washington St.
Indianapolis, IN. 46201

Re: 097-14357-00298
First Administrative Amendment to
FESOP 097-7708-00298

Dear Ms. Guffey:

Print Communications, Inc. was issued a FESOP on July 21, 1997 for a commercial printing operation. A letter requesting the addition of two nonheatset lithographic presses and the cessation of one existing heatset lithographic press and one nonheatset lithographic press was received on May 7, 2001. Since this modification adds an emission unit of the same type, does not result in any increased potential to emit, and also does not trigger 326 IAC 8-1-6 applicability by emitting 25 tons or more of VOCs per year, then pursuant to the provisions of 326 IAC 2-8-10 and pursuant to the applicability of 326 2-8-10(a)(14), the permit is hereby administratively amended as follows:

The permit revision pertains to the addition of two nonheatset lithographic presses described as Emission Unit ID 11 (PCIE) and Emission Unit ID 12 (New). Furthermore, Emission Unit ID 5 and Emission Unit ID 6 were removed to reflect termination of operation. Listed below are the following changes with bold face depicting additions and strikeout depicting deletions.

1. Equipment descriptions in Section A.2 Source Summary have been amended to exclude/ include the following:
 - d) ~~Emissions unit 5 is Goss B nonheatset lithographic web press with a maximum process capacity 22.58 million square inches per hour. Emissions from this emission unit are exhausted in to the building.~~
 - d) **Emission unit 11 is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. Emissions from this emission unit are exhausted into the building.**
 - e) ~~Emissions unit 6 is a Goss A heatset lithographic web press with a maximum process capacity 24.09 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-4~~
 - e) **Emission unit 12 is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 23.22 million square inches per hour. Emissions from this emission unit are exhausted into the building.**
2. The addition of Emission Unit ID 11 and Emission Unit ID 12, as well as the deletion of Emission Unit ID 5 and Emission Unit ID 6 have been incorporated into the Emission Unit description box of Section D.1 FACILITY OPERATION CONDITIONS as follows:

The following six (6) Lithographic Printing Presses:

- a) Emission unit 1 is a Heidelberg MO nonheatset lithographic sheet fed press with a maximum process capacity 5.82 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- b) Emissions unit 2 is a Harris M110 heatset lithographic web press with a maximum process capacity 18.72 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-1.
- c) Emissions unit 4 is a Harris M200 heatset lithographic web press with a maximum process capacity 25.92 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-3
- ~~d) Emissions unit 5 is Goss B nonheatset lithographic web press with a maximum process capacity 22.58 million square inches per hour. Emissions from this emission unit are exhausted in to the building.~~
- d) Emission unit 11 is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. Emissions from this emission unit are exhausted into the building.**
- ~~e) Emissions unit 6 is a Goss A heatset lithographic web press with a maximum process capacity 24.09 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-4~~
- e) Emission unit 12 is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 23.22 million square inches per hour. Emissions from this emission unit are exhausted into the building.**
- f) Emissions unit 7 is a Diddie Glaser nonheatset lithographic web press with a maximum process capacity 7.56 million square inches per hour. Emissions from this emission unit are exhausted in to the building.

3. Permit Conditions in section D.1 FACILITY OPERATION CONDITIONS are amended as follows to reflect the addition of Emission Unit ID's 11 and 12, and the deletion of Emission Unit ID's 5 and 6.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total VOC emissions for emissions units numbers 1, 2, 4, ~~5, 6~~, 7, **11, and 12**, and emission units 9 and 10 identified in section D.2 shall not exceed 7.90 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.1.1.

- (a) The VOC emissions from emission unit 2, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (b) The VOC emissions from emission unit 4, including cleanup solvents, shall not equal or

exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

- (c) The VOC emissions from emission unit **5, 11**, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (d) The VOC emissions from emission unit **6, 12**, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitations contained in Conditions D.1.1 and D.1.2 shall be determined based emission calculations using the weight percent of VOC per coating established using methods specified in 326 IAC 8-1-4(a)(3)(A) as supplied by the coating manufacturer, weight of VOC containing materials used during the respective compliance periods, a VOC retention factor of 95% for nonheatset inks and a VOC retention factor of 15% for heatset inks. IDEM, OAQ, and ERMD reserves the authority to determine compliance using emissions calculations in conjunctions with Method 24 and analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1 and D.1.2.
 - (1) The daily weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used,
 - (2) The VOC content (weight percent) of each material used, and
 - (3) The monthly weight of VOCs emitted.
- b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses 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.

- (d) The addition of Emission Unit ID's 11 and 12, and the deletion of Emmission Unit ID's 5 and 6 requires the FESOP Quarterly Report Form to be amended as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Quarterly Report

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
FESOP No.: F097-7708-00298
Facility: Emitting units 1, 2, 4, ~~5, 6~~, 7, 9, 10, **11, and 12**
Parameter: Volatile Organic Compound Emissions
Limit: 2 tons of VOC per month for emitting units 2, 4, ~~5, 6~~, 9, 10, **11, and 12** individually; 7.90 ton per month for all emitting units combined.

Emitting Unit	VOC Emissions (tons/month)		
	Month	Month	Month
1			
2			
4			
5 11			
6 12			
7			
9			
10			
Total			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott L. Dombrowski, at (317) 327-2176.

Sincerely,

Vaneeta Kumar, Administrator
Indianapolis, ERMD

Attachments-amended FESOP pages

SLD

cc: file (2 copies)
Mindy Hahn, IDEM OAQ

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

**Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-7708-00298	
Issued by: Dr. Robert Holm, Administrator	Issuance Date: July 21, 1997
First Significant Permit Modification SMF 097-9276	Affected Pages: 4, 24, 25, 27 Pages 23a and 23b supercede Page 23 Pages 26a through 26d supercede Page 26 Pages 28a and 28b supercede Page 28 Pages 29a through 29c supercede Page 29
Issued by: Dr. Robert Holm, Administrator	Issuance Date: March 16, 1998

First Administrative Amendment AAF 097-14357-00298		Affected Pages: 4, 24, 25, and 29	
Issued by: Vaneeta Kumar, Administrator Indianapolis, ERMD		Issuance Date:	

SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and ERMD and submitted to IDEM, OAQ and ERMD.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Stationary Commercial Printing Source.

Responsible Official: Randy Steenbergen
Source Address: 2457 East Washington Street
Mailing Address: Indianapolis, Indiana, 46201
SIC Code: 2759
County Location: Marion
County Status: Attainment for all pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- a) Emission unit 1 is a Heidelberg MO nonheatset lithographic sheet fed press with a maximum process capacity 5.82 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- b) Emissions unit 2 is a Harris M110 heatset lithographic web press with a maximum process capacity 18.72 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-1.
- c) Emissions unit 4 is a Harris M200 heatset lithographic web press with a maximum process capacity 25.92 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-3
- d) Emission unit 11 is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- e) Emission unit 12 is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 23.22 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- f) Emissions unit 7 is a Diddie Glaser nonheatset lithographic web press with a maximum process capacity 7.56 million square inches per hour. Emissions form this emission unit are exhausted in to the building.
- g) Emission Unit #9 is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-2.
- h) Emission Unit #10 is a Goss C nonheatset lithographic web press with a maximum operating capacity of 27.09 million square inches per hour. VOC emissions from this emission unit are exhausted to the building.

SECTION D.1

FACILITY OPERATION CONDITIONS

The following six (6) Lithographic Printing Presses:

- a) Emission unit 1 is a Heidelberg MO nonheatset lithographic sheet fed press with a maximum process capacity 5.82 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- b) Emissions unit 2 is a Harris M110 heatset lithographic web press with a maximum process capacity 18.72 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-1.
- c) Emissions unit 4 is a Harris M200 heatset lithographic web press with a maximum process capacity 25.92 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-3
- d) Emission unit 11 is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- e) Emission unit 12 is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 23.22 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- f) Emissions unit 7 is a Diddie Glaser nonheatset lithographic web press with a maximum process capacity 7.56 million square inches per hour. Emissions from this emission unit are exhausted in to the building.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total VOC emissions for emissions units numbers 1, 2, 4, 7, 11, and 12, and emission units 9 and 10 identified in section D.2 shall not exceed 7.90 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.1.1.

- (a) The VOC emissions from emission unit 2, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (b) The VOC emissions from emission unit 4, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (c) The VOC emissions from emission unit 11, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (d) The VOC emissions from emission unit 12, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitations contained in Conditions D.1.1 and D.1.2 shall be determined based emission calculations using the weight percent of VOC per coating established using methods specified in 326 IAC 8-1-4(a)(3)(A) as supplied by the coating manufacturer, weight of VOC containing materials used during the respective compliance periods, a VOC retention factor of 95% for nonheatset inks and a VOC retention factor of 15% for heatset inks. IDEM, OAQ, and ERMD reserves the authority to determine compliance using emissions calculations in conjunctions with Method 24 and analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1 and D.1.2.
- (1) The daily weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used,
 - (2) The VOC content (weight percent) of each material used, and
 - (3) The monthly weight of VOCs emitted.
- b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses 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 QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Quarterly Report

Source Name: Print Communications
 Source Address: 2457 East Washington Street, Indianapolis, Indiana
 Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
 FESOP No.: F097-7708-00298
 Facility: Emitting units 1, 2, 4, 7, 9, 10, 11, and 12
 Parameter: Volatile Organic Compound Emissions
 Limit: 2 tons of VOC per month for emitting units 2, 4, 9, 10, 11, and 12 individually; 7.90 ton per month for all emitting units combined.

Emitting Unit	VOC Emissions (tons/month)		
	Month	Month	Month
1			
2			
4			
11			
12			
7			
9			
10			
Total			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____