NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Print Support, Inc.
860 East State Street
Huntington, Indiana 46750

And

Mignone Communications, Inc.
880 East State Street
Huntington, Indiana 46750

(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, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 069-14670-00059	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 12, 2001 Expiration Date: November 12, 2006

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary graphic arts commercial printing source.

Authorized Individual:	Print Support, Inc.: Thomas Karst; and Mignone Communications, Inc.: John Mignone
Source Address:	Print Support, Inc.: 860 East State Street, Huntington, Indiana 46750; and Mignone Communications, Inc.: 880 East State Street, Huntington, Indiana 46750
Mailing Address:	Print Support, Inc.: 860 East State Street, Huntington, Indiana 46750; and Mignone Communications, Inc.: 880 East State Street, Huntington, Indiana 46750
Phone Number:	(219) 358-0266
SIC Code:	2759
County Location:	Huntington
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Major Source, under Part 70 Rules; Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

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:

Mignone Communications, Inc.

(a) One (1) heatset web lithographic printing press (ID No. 1), with a maximum line speed of 1,400 feet per minute and a maximum printing width of 38 inches, with a catalytic oxidizer for VOC control, with a supplementary fuel input of 2.5 million British thermal units per hour, exhausting through one (1) stack (ID No. S1).

(b) One (1) natural gas-fired dryer for the heatset web lithographic printing press, with a maximum heat input of 2.422 million British thermal units (MMBtu) per hour, exhausting through one (1) stack (ID No. S1).

(c) One (1) inkjet printer, used primarily for printing labels.

Print Support, Inc.

(d) One (1) non-heatset offset lithographic three web printing press (five (5) color newspaper press), identified as Press 2, with a maximum line speed of 2843.75 feet per minute, a maximum print width of 35 inches and a capacity of 90,000 impressions per hour.

(e) One (1) natural gas comfort heater, capacity: 0.1309 million British thermal units per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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 [IC 13-15-5-3]

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 the Section B condition entitled “Minor Source Operating Permit”, 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 Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(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) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (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, OAQ, 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 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration date.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

(a) The total source potentials to emit of PM, PM_{10}, VOC, CO, SO_2 and NO_X are less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit of PM, PM_{10}, VOC, CO, SO_2 or NO_X to two hundred fifty (250) tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Part 70 Major Source

Pursuant to 326 IAC 2-7 (Part 70 Permit Program), this source is a major source.

C.3 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) 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.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan 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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Source Modification [326 IAC 2-7-10.5]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-10.5 whenever the Permittee seeks to construct new emissions units, modify existing emissions units, or otherwise modify the source.

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.5 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, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a 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 the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(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.

C.6 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, OAQ, 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 a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, 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.7 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.8 Opacity [326 IAC 5-1]

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

(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.9 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.10 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, 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.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D 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.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 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 Quality
100 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, OAQ, 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.

C.18 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.19 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, OAQ, 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 failure to implement the Preventive Maintenance Plan 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 when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly or semi-annual 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).

(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) 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.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) heatset web lithographic printing press (ID No. 1), with a maximum line speed of 1,400 feet per minute and a maximum printing width of 38 inches, with a catalytic oxidizer for VOC control, with a supplementary fuel input of 2.5 million British thermal units per hour, exhausting through one (1) stack (ID No. S1).

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths 2.9 pounds per gallon), excluding water, from the one (1) heatset web lithographic printing press.

In order to comply with this VOC limit, the catalytic oxidizer shall operate at all times that the printing press (ID No. 1) and the 2.422 MMBtu per hour dryer for the press are in operation and shall maintain a minimum overall control efficiency of 49.6%.

(b) Based upon 326 IAC 8-1-2(c) and the overall minimum control efficiency of 49.6%, the VOC content of the coating shall not exceed 9.51 pounds per gallon of coating solids delivered to the applicator.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Any change or modification at the one (1) heatset web printing press which has the potential to emit PM, other than emissions from combustion, shall cause the facility to become subject to the requirements of 326 IAC 6-3-2 (Process Operations) and shall require prior OAQ approval.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for the one (1) heatset web lithographic printing press and the catalytic oxidizer.

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

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between June 15, 2004 and December 15, 2005, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.1 and D.1.7. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-1-2(a)(7), when volume weighted averaging of the coatings is used to determine compliance with the limitation set in Condition D.1.1. This volume weighted average shall be determined by the following equation:

$$A = [\ 3\ (C \times U) / 3\ U]$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon
and U is the usage rate of the coating in gallons per unit, hour, day or other unit of time

D.1.7 Catalytic Oxidizer

(a) The catalytic oxidizer shall operate at all times that the process is in operation. When operating, the oxidizer shall maintain a minimum operating temperature of 642EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 98% based on the stack capture and destruction efficiency test conducted on June 15, 1999.

(b) When operating the catalytic oxidizer to achieve compliance with 326 IAC 8-2-5, two and nine tenths (2.9) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the catalytic oxidizer shall maintain a minimum overall control efficiency of 49.6%. These efficiencies and the use of the catalytic oxidizer are required by rule 326 IAC 8-1-2(a)(2).

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.1.8 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the oxidizer is in operation. This amperage shall be maintained within the range of 9.5 to 11.5, as established in must recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.7 and D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with 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 continuous temperature records for the catalytic oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and

(5) Weekly records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) natural gas-fired dryer for the heatset web lithographic printing press, with a maximum heat input of 2.422 million British thermal units (MMBtu) per hour, exhausting through one (1) stack (ID No. S1).

(c) One (1) inkjet printer, used primarily for printing labels.

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

There are no conditions specifically applicable to these emissions units.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) One (1) non-heatset offset lithographic three web printing press (five (5) color newspaper press), identified as Press 2, with a maximum line speed of 2843.75 feet per minute, a maximum print width of 35 inches and a capacity of 90,000 impressions per hour.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths 2.9 pounds per gallon), excluding water, from the one (1) non-heatset offset lithographic printing press.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Any change or modification at the one (1) non-heatset offset printing press which has the potential to emit PM, excluding emissions from combustion, shall cause the facility to become subject to the requirements of 326 IAC 6-3-2 (Process Operations) and shall require prior OAQ approval.

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

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for the one (1) non-heatset offset printing press.

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

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.3.1.

(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; and

(2) A log of the dates of use.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) natural gas comfort heater, capacity: 0.1309 million British thermal units per hour.

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

There are no conditions specifically applicable to this emissions unit.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Print Support, Inc. and Mignone Communications, Inc.**
Address:	**860 East State Street and 880 East State Street**
City:	**Huntington, Indiana**
Phone #:	**(219) 358-0266**
MSOP #:	**069-14670-00059**

I hereby certify that Print Support, Inc. and Mignone Communications, Inc. is

9 still in operation.
9 no longer in operation.

I hereby certify that Print Support, Inc. and Mignone Communications, Inc. is

9 in compliance with the requirements of MSOP 069-14670-00059
9 not in compliance with the requirements of MSOP 069-14670-00059

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

November 27, 2001

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	**Print Support, Inc.**
	Mignone Communications, Inc.
Source Location:	**860 East State Street, Huntington, Indiana 46750**
	880 East State Street, Huntington, Indiana 46750
County:	**Huntington**
Construction Permit No.:	**MSOP 069-14670-00059**
SIC Code:	**2759**
Permit Reviewer:	**CarrieAnn Paukowits**

On October 1, 2001, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Print Support, Inc. and Mignone Communications, Inc. had applied for a construction and operating permit to construct and operate a non-heatset offset lithographic printing press. The notice also stated that OAQ 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 November 5, 2001, Mr. Ron Ward of Cornerstone Environmental, Health and Safety, Inc., on behalf of Print Support, Inc. and Mignone Communications, Inc., submitted comments on the proposed construction and operating permit. The summary of the comments and corresponding responses are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

Under Section A - Authorized Individual, the name Mark Ruest should be replaced with the name John Mignone. In view of the fact that two authorized individuals are identified in the permit, it requested that language be included in the permit to specifically describe who may sign the Annual Certification. It is assumed that one Annual Certification will be required by the entire source.

Response 1:

Either Authorized Individual may sign the Annual Notification. The Authorized Individual in Section A.1 has been revised as follows:

Authorized Individual: Print Support, Inc.: Thomas Karst; and
Mignone Communications, Inc.: ~~Mark Ruest~~ **John Mignone**

One (1) Annual Notification is required for the entire source. This has been clarified on the form as follows:

I hereby certify that Print Support, Inc. **and Mignone Communications, Inc.** is
9 still in operation.
9 no longer in operation.

I hereby certify that Print Support, Inc. **and Mignone Communications, Inc.** is
9 in compliance with the requirements of MSOP 069-14670-00059
9 not in compliance with the requirements of MSOP 069-14670-00059

Comment 2:

In Section D.3, the press is identified as Press 1. So as to avoid confusion, it is suggested that this press be identified as Press 2. Section A would have to be modified accordingly if this change is made.

Response 2:

The facility description in Section A.2(d) and the Emission Unit Description Box in Section D.3 has been revised as follows:

(d) One (1) non-heatset offset lithographic three web printing press (five (5) color newspaper press), identified as **Press 2** ~~Press 1~~, with a maximum line speed of 2843.75 feet per minute, a maximum print width of 35 inches and a capacity of 90,000 impressions per hour.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Names:	**Print Support, Inc.**
	Mignone Communications, Inc.
Source Locations:	**860 East State Street, Huntington, Indiana 46750**
	880 East State Street, Huntington, Indiana 46750
County:	**Huntington**
SIC Code:	**2759**
Operation Permit No.:	**MSOP 069-14670-00059**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed an application from Print Support, Inc. relating to the construction and operation of a non-heatset offset lithographic printing press. A comprehensive MSOP is proposed for the new construction and the existing Mignone Communications, Inc. graphic art commercial printing source, which are being considered a single source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Mignone Communications, Inc.

(a) One (1) heatset web lithographic printing press (ID No. 1), with a maximum line speed of 1,400 feet per minute and a maximum printing width of 38 inches, with a catalytic oxidizer for VOC control, with a supplementary fuel input of 2.5 million British thermal units per hour, exhausting through one (1) stack (ID No. S1).

(b) One (1) natural gas-fired dryer for the heatset web lithographic printing press, with a maximum heat input of 2.422 million British thermal units (MMBtu) per hour, exhausting through one (1) stack (ID No. S1).

(c) One (1) inkjet printer, used primarily for printing labels.

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:

Print Support, Inc.

(a) One (1) non-heatset offset lithographic three web printing press (five (5) color newspaper press), identified as Press 1, with a maximum line speed of 2843.75 feet per minute, a maximum print width of 35 inches and a capacity of 90,000 impressions per hour.

(b) One (1) natural gas comfort heater, capacity: 0.1309 million British thermal units per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP-069-9963-00059, issued on October 5, 1998; and

(b) Amendment 069-12871-00059, issued on November 16, 2000.

All conditions from previous approvals were incorporated into this permit.

Source Definition

This graphic art commercial printing consists of a source with an on-site contractor:

(a) Print Support, Inc., the new proposed supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and

(b) Mignone Communications, Inc., the existing primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

Although, the two (2) companies have separate addresses, they are located in the same building. Therefore, Print Support, Inc. and Mignone Communications, Inc. are located on contiguous properties. Print Support, Inc. and Mignone Communications, Inc. have the same SIC code and the majority of product from one source is input to the other for further processing. In addition, the President of Print Support, Inc. is the Controller of Mignone Communications, Inc. and the Vice President of Print Support, Inc. is also the Vice President of Mignone Communications, Inc. Therefore, although no third party owns more than fifty percent (50%) of both Print Support and Mignone Communications, officers of both companies are directly involved with the day to day operations of both companies. Therefore, IDEM has determined that the two (2) companies, Print Support, Inc. and Mignone Communications, Inc., are under common control, and the two (2) entities are considered a single source pursuant to 326 IAC 1-2-73, "Source" definition, and 326 IAC 2-7-1, definition of Major Source. Therefore, the term "source" in the New Source Construction and Minor Source Operating Permit documents refers to both Mignone Communications, Inc. and Print Support, Inc. as one source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S1	One (1) heatset web lithographic printing press (ID No. 1) owned by Mignone Communications, Inc.	32	1.67	2,000	650 - 1,000

There are no stacks associated with the emission units that comprise Print Support, Inc.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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 July 20, 2001, with additional information received on August 8, August 16, and September 4, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8 of 8).

Unrestricted 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 or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency." This is the potential to emit of the entire source (Print Support, Inc. and Mignone Communications, Inc.) before controls and limitations.

Pollutant	**Potential To Emit** (tons/year)
PM	0.042
PM_{10}	0.168
SO_2	0.013
VOC	163
CO	1.86
NO_X	2.22

HAPs	**Potential To Emit** (tons/year)
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	0.002

HAPs	Potential To Emit (tons/year)
Hexane	0.040
Toluene	negligible
Lead	negligible
Cadmium	negligible
Chromium	negligible
Manganese	negligible
Nickel	negligible
Glycol Ether	5.14
Ethylene Glycol	1.68
Cumene	2.63
Xylene	1.80
TOTAL	11.3

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

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.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPS**
One (1) heatset web lithographic printing press (ID No. 1) with catalytic oxidizer	0.021	0.083	0.007	44.6	0.920	1.10	4.72
One (1) natural gas-fired dryer for the heatset web lithographic printing press	0.020	0.081	0.006	0.058	0.891	1.06	0.020
One (1) inkjet printer	negligible	negligible	negligible	negligible	negligible	negligible	negligible

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
One (1) non-heatset offset lithographic three web printing press (five (5) color newspaper press), identified as Press 1	-	-	-	74.1	-	-	6.54
One (1) natural gas comfort heater	0.001	0.004	0.0003	0.003	0.048	0.057	0.001
Total Emissions	0.042	0.168	0.013	119	1.86	2.22	5.14 individual 11.3 total

County Attainment Status

The source is located in Huntington 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 emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Huntington County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing 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	0.042
PM_{10}	0.168
SO_2	0.013
VOC	119
CO	1.86
NO_X	2.22
Single HAP	5.14
Combination HAPS	11.3

(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.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source based on the emissions summarized in this permit, MSOP 069-14670-00059, is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) at least one of the criteria pollutant is greater than or equal to one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is greater than or equal to ten (10) tons per year, or

(c) any combination of HAPS is greater than or equal to twenty-five (25) tons per year.

This source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V. This source may limit VOC emissions to less than one hundred (100) tons per year and request a Federally Enforceable State Operating Permit (FESOP) instead of a Title V Operating Permit. At that time, Print Support, Inc. and Mignone Communications, Inc. can opt for separate operating permits for administrative purposes, while being considered a single source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The requirements of the New Source Performance Standards (326 IAC 12) and 40 CFR 60.430, Subpart QQ - Standards of Performance for the Graphic Arts Industry, Publication Rotogravure Printing, do not apply to the one (1) non-heatset offset or one (1) heatset web lithographic printing press because the presses are not rotogravure printing presses.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry, does not apply to this source because it is not a major source of hazardous air pollutants (HAPs), nor does it encompass a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

The potential to emit each individual HAP is less than ten (10) tons per year and the potential to emit total HAPs is less than twenty-five (25) tons per year from the total of all processes at this source. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

(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 owned by Mignone Communications, Inc.

326 IAC 6-3-2 (Process Operations)

There is no anti-setoff powder used on the one (1) heatset web lithographic printing press. Therefore, there are no PM emissions from that process. The only potential for PM emissions at this source is from combustion. Therefore, the requirements of 326 IAC 6-3-2 are not applicable.

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

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no specific rule in article 8 is applicable. Since the requirements of 326 IAC 8-2-5 (Paper Coating Operations) are applicable to the one (1) heatset web lithographic printing press, the requirements of 326 IAC 8-1-6 are not applicable.

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

This is a web coating press in which one hundred percent (100%) of the paper is coated. Therefore, the heatset web lithographic printing press (ID No. 1) is subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths 2.9 pounds per gallon), excluding water, from the one (1) heatset web lithographic printing press. The worst case coating that will be used in the printing press contains 4.76 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use a catalytic oxidizer to control VOC emissions in order to achieve this emission limitation. Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - L / D)$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC.
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture system and control device, as a percentage, needed in order to meet the emission limitation is determined by the following equation:

$$O = (V - E)/V \times 100$$

where: V = The actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 9.51 pounds VOC per gallon of coating solids
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 49.63%

The VOC capture system for the printing press has a capture efficiency of 75%. The catalytic oxidizer destruction efficiency is 95%. This is equivalent to an overall control efficiency of 71.25%. Therefore, the source is in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic oxidizer has an overall control efficiency which exceeds the required control efficiency of 49.63%.

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

The one (1) heatset web lithographic printing press is not a packaging rotogravure, publication rotogravure or flexographic printing source. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.

State Rule Applicability - Individual Facilities owned by Print Support, Inc.

326 IAC 6-3-2 (Process Operations)

There is no anti-setoff powder used on the one (1) non-heatset offset lithographic printing press. Therefore, there are no PM emissions from that process. The only potential for PM emissions at this source is from combustion. Therefore, the requirements of 326 IAC 6-3-2 are not applicable.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no specific rule in article 8 is applicable. Since the requirements of 326 IAC 8-2-5 (Paper Coating Operations) are applicable to the one (1) non-heatset offset lithographic printing press, the requirements of 326 IAC 8-1-6 are not applicable.

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

The one (1) non-heatset offset lithographic printing press has the potential to emit more than fifteen (15) pounds per day of VOC and the press coats one hundred percent (100%) of the paper. Therefore, the press is subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths 2.9 pounds per gallon), excluding water at the one (1) non-heatset offset lithographic printing press. The one (1) non-heatset offset lithographic printing press will comply with this rule as shown in the following tables:

Ink	Material Density (lbs ink/gallon ink)	Weight % Organics	Volume % Water	VOC content as supplied (lbs VOC/gallon of coating less water)[1]
Flint Ink A/L Low Rub Premium Black	8.572	5.356	2.06	0.450
Flint Ink A/L AD-LItho AOOO Soy Plus Pro Blue	8.988	2.476	0.00	0.223
Flint Ink A/L AD-LItho OAOO Soy Plus Pro Red	9.071	4.226	0.00	0.383
Flint Ink A/L AD-LItho OAO Soy Plus Pro Yellow	8.871	1.969	1.60	0.172

[1]VOC content as supplied = Material Density x Weight % Organics x (1 - Volume % Water)

VOC content as applied, including Fountain Solution

Ink	VOC content as supplied (lbs VOC/gallon of coating less water)	VOC content of Fountain Solution (lbs VOC/ gallon of solution less water)	Weight % Fountain Solution in as applied coating of ink + solution	VOC content as applied (lbs VOC/ gallon of coating of ink + solution less water)[1]	VOC content of Wash (lbs VOC/ gallon of solution less water)	Weight % Wash in as applied coating of ink + solution + wash	VOC content as applied (lbs VOC/gallon of ink + solution + wash less water)[2,3]
Flint Ink A/L Low Rub Premium Black	0.450	2.1	3.31	0.505	6.6	5.19	0.821

[1] VOC content as applied coating of ink + solution = (VOC content as supplied of worst case coating x (1 - Weight % Fountain Solution in as applied coating of ink + solvent) + (VOC content of Fountain Solution x Weight % Fountain Solution in as applied coating of ink + solution)

[2] Though the Blanket and Roller Wash is not part of the coating, it can mix with the coating during operation, and, therefore, has been included in the final VOC content as applied calculation to determine the worst case VOC content as applied

[3] VOC content as applied coating of ink + solution + wash = (VOC content as applied coating of ink + solution x (1 - Weight % Wash in as applied coating of ink + solvent + wash) + (VOC content of Wash x Weight % Wash in as applied coating of ink + solution + wash)

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

The one (1) non-heatset offset lithographic printing press is not a packaging rotogravure, publication rotogravure or flexographic printing source. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.

Conclusion

The construction and operation of this graphic arts commercial printing source shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 069-14670-00059.

Appendix A: Emissions Calculations
VOC From Printing Press Operations
One (1) heatset web lithographic printing press at Mignone Communications, Inc.

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
Address City IN Zip of Mignone Communications, Inc.: **880 East State Street , Huntington, Indiana 46750**
MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
ID No. 1	1400	38	335543

INK VOCS

Ink Name Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Organic Volatiles*	Flash Off %	Throughput (MMin^2/Year)	VOC Emissions (tons/year)
Process Yellow Ink	**1**	**47.56%**	**80.00%**	**335543**	**63.83**
Process Magenta Ink	1	41.77%	80.00%	335543	56.06
Process Cyan Ink	1	44.77%	80.00%	335543	60.09
Process Black Ink	1	42.48%	80.00%	335543	57.02
307 TW Fountain Solution	0.10	4.5%	100.00%	335543	0.75
One Step Wash Up WM 1488	0.07	98.0%	100.00%	335543	11.84
Blanket and Roller Wash Y120 WM	0.07	100.0%	100.00%	335543	12.08

Total VOC Emissions =	**88.5 Tons/yr**
Catalytic Oxidizer Actual Overall Control Efficiency =	**71.25%**
Total VOC Emissions after Actual Controls =	**25.4 Tons/yr**
Catalytic Oxidizer Required Overall Control Efficiency =	**49.60%**
Total VOC Emissions after Required Controls =	**44.6 Tons/yr**

Calculations based upon CP 069-9963-00059, issued on October 5, 1998

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Total VOC (Tons/Year) after controls = Total VOC Emissions (Tons/year) x (1 - Control Efficiency)

HAPs

Ink Name Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Glycol Ethers	Weight % Cumene	Weight % Xylenes	Weight % Ethyle	Flash Off %	Throughput (MMin^2/Year)	Glycol Ether Emissions (tons/year)	Cumene Emissions (tons/year)	Xylene Emissions (tons/year)	Ethylene Glycol Emissions (tons/year)	Total HAP Emissions (tons/year)
Process Yellow Ink	1	0.00%	0.00%	0.00%	0.00%	80.00%	335543	0.00	0.00	0.00	0.00	0.00
Process Magenta Ink	1	0.00%	0.00%	0.00%	0.00%	80.00%	335543	0.00	0.00	0.00	0.00	0.00
Process Cyan Ink	1	0.00%	0.00%	0.00%	0.00%	80.00%	335543	0.00	0.00	0.00	0.00	0.00
Process Black Ink	1	0.00%	0.00%	0.00%	0.00%	80.00%	335543	0.00	0.00	0.00	0.00	0.00
307 TW Fountain Solution	0.10	5.0%	0.0%	0.0%	10.0%	100.00%	335543	0.84	0.00	0.00	1.68	2.52
One Step Wash Up WM 1488	0.07	10.0%	2.0%	2.5%	0.0%	100.00%	335543	1.21	0.24	0.30	0.00	1.75
Blanket and Roller Wash Y120 WM	0.07	0.0%	1.6%	2.0%	0.0%	100.00%	335543	0.00	0.19	0.24	0.00	0.43
											Total:	**4.70**

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

HAP = Maximum Coverage pounds per MMin^2 * Weight percentage HAP * 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 Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations
One (1) non-heatset offset lithographic printing press at Print Support, Inc.

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
Address City IN Zip of Mignone Communications, Inc.: **880 East State Street , Huntington, Indiana 46750**
MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press 1	2843.75	35	627764

INK VOCS

Ink Name / Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Organic Volatiles*	Flash Off %	Throughput (MMin^2/Year)	VOC Emissions (tons/year)
Flint Ink A/L Low Rub Premium Black	**3.5**	**5.36%**	**5.00%**	**627764**	**2.94**
Flint Ink A/L AD-Litho AOOO Soy Plus Pro Blue	3.5	2.48%	5.00%	627764	1.36
Flint Ink A/L AD-Litho OAOO Soy Plus Pro Red	3.5	4.23%	5.00%	627764	2.32
Flint Ink A/L AD-Litho OAO Soy Plus Pro Yellow	3.5	3.47%	5.00%	627764	1.91
Anchor Lithokemko (Fountain Solution)	0.12	22.5%	100.00%	627764	8.49
Rycoline Products Blanket and Roller Wash	0.20	99.9%	100.00%	627764	62.71

Total VOC Emissions =	**74.1 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

HAPs

Ink Name / Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Glycol Ethers	Weight % Cumene	Weight % Xylenes	Flash Off %	Throughput (MMin^2/Year)	Glycol Ether Emissions (tons/year)	Cumene Emissions (tons/year)	Xylene Emissions (tons/year)	Total HAP Emissions (tons/year)
Flint Ink A/L Low Rub Premium Black	3.5	0.00%	0.00%	0.00%	5.00%	627764	0.00	0.00	0.00	0.00
Flint Ink A/L AD-Litho AOOO Soy Plus Pro Blue	3.5	0.00%	0.00%	0.00%	5.00%	627764	0.00	0.00	0.00	0.00
Flint Ink A/L AD-Litho OAOO Soy Plus Pro Red	3.5	0.00%	0.00%	0.00%	5.00%	627764	0.00	0.00	0.00	0.00
Flint Ink A/L AD-Litho OAO Soy Plus Pro Yellow	3.5	0.00%	0.00%	0.00%	5.00%	627764	0.00	0.00	0.00	0.00
Anchor Lithokemko (Fountain Solution)	0.12	8.2%	0.0%	0.0%	100.00%	627764	3.09	0.00	0.00	3.09
Rycoline Products Blanket and Roller Wash	0.20	0.0%	3.5%	2.0%	100.00%	627764	0.00	2.20	1.26	3.45
									Total:	**6.54**

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

HAP = Maximum Coverage pounds per MMin^2 * Weight percentage HAP * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-HEATSET OFFSET PRINGTING HAS AN ASSUMED FLASH OFF OF 5%. 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 Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Supplemental Fuel for Catalytic Oxidizer

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
Address City IN Zip of Mignone Communications, Inc.: **880 East State Street , Huntington, Indiana 46750**
MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.5	21.90

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.021	0.083	0.007	1.10	0.060	0.920

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Supplemental Fuel for Catalytic Oxidizer
HAPs Emissions

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
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MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.30E-05	1.31E-05	8.21E-04	1.97E-02	3.72E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	5.48E-06	1.20E-05	1.53E-05	4.16E-06	2.30E-05	0.021

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) dryer

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
Address City IN Zip of Mignone Communications, Inc.: **880 East State Street , Huntington, Indiana 46750**
MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.4220	21.22

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.020	0.081	0.006	1.06	0.058	0.891

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) dryer
HAPs Emissions

Company Names: Print Support, Inc. and Mignone Communications, Inc.
Address City IN Zip of Print Support, Inc.: 860 East State Street , Huntington, Indiana 46750
Address City IN Zip of Mignone Communications, Inc.: 880 East State Street , Huntington, Indiana 46750
MSOP: 069-14670
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: July 20, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.23E-05	1.27E-05	7.96E-04	1.91E-02	3.61E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	5.30E-06	1.17E-05	1.49E-05	4.03E-06	2.23E-05	0.020

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) comfort heater

Company Names: **Print Support, Inc. and Mignone Communications, Inc.**
Address City IN Zip of Print Support, Inc.: **860 East State Street , Huntington, Indiana 46750**
Address City IN Zip of Mignone Communications, Inc.: **880 East State Street , Huntington, Indiana 46750**
MSOP: **069-14670**
Plt ID: **069-00059**
Reviewer: **CarrieAnn Paukowits**
Date: **July 20, 2001**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.1309	1.15

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.001	0.004	0.0003	0.057	0.003	0.048

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) comfort heater
HAPs Emissions

Company Names: Print Support, Inc. and Mignone Communications, Inc.
Address City IN Zip of Print Support, Inc.: 860 East State Street , Huntington, Indiana 46750
Address City IN Zip of Mignone Communications, Inc.: 880 East State Street , Huntington, Indiana 46750
MSOP: 069-14670
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: July 20, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.20E-06	6.88E-07	4.30E-05	1.03E-03	1.95E-06

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	2.87E-07	6.31E-07	8.03E-07	2.18E-07	1.20E-06	0.001

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.