



Mayor Jonathan Weinzapfel

City of Evansville
ENVIRONMENTAL PROTECTION AGENCY
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MEMORANDUM

DATE: September 12, 2006
TO: Interested Parties / Applicant
FROM: Dona J. Bergman
Director
Evansville Environmental Protection Agency

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management and the City of Evansville Environmental Protection Agency, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, suite 618, Indianapolis, IN 46204, within fifteen (15) days from the date of receipt of this notice. The filing of petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA); or
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, name of the applicant, location, date of this notice and the following:

- (1) the name and address of the person making the request; and
- (2) the interest of the person making the request; and
- (3) identification of any persons represented by the person making the request; and
- (4) the reasons, with particularity, for the request; and
- (5) the issues with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to IC 4-21.5-3-5 (d), the Office of Environmental Adjudication will provide you with notice of any prehearing conferences, preliminary hearing, hearings, stays, or orders disposing of the review of this decision if a written request is submitted to the Office of Environmental Adjudication at the above address. If you have procedural or scheduling questions regarding your petition, you may contact the OEA at 317-232-8591. If you have any other questions regarding the enclosed document, please contact the Evansville Environmental Protection Agency at 812-435-6145 or the Office of Air Quality at 317-233-0178.

CITY OF EVANSVILLE
ENVIRONMENTAL PROTECTION AGENCY



Mayor Jonathan Weinzapfel

C. K. Newsome Center, 100 E. Walnut Street, Suite 100
Evansville, Indiana 47713
(812) 435-6145
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**NEW SOURCE REVIEW AND
Minor Source Operating Permit (MSOP)
Indiana Department of Environmental Management
OFFICE OF AIR QUALITY
AND EVANSVILLE EPA**

**Keller Crescent Company, Inc.
1100 E. Louisiana Street
Evansville, Indiana 47711**

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

Indiana statutes from IC13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

This permit is issued to the above mentioned company under the provisions 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780 with conditions listed on the attached pages. This permit also addressed certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-6.1-6, applicable to those conditions.

Operation Permit No.: 163-18502-00097	
(original signed by) Issued by: Dona Bergman Director, Evansville EPA	Issuance Date: September 12, 2006 Expiration Date: September 12, 2011

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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) and Evansville EPA (EEPA). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary commercial lithographic printing facility.

Authorized Individual:	Chris Feagans
Source Address:	1100 E. Louisiana Street, Evansville, IN, 47711
Mailing Address:	1100 E. Louisiana Street, Evansville, IN, 47711
General Source Phone Number:	(812) 464-2461
SIC Code:	2752
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM2.5 annual particulate standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust.
- (b) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1990, identified as 39, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S39.
- (c) One (1) Man-Roland Series 327, non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute, and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack identified as S41.
- (d) One (1) Man-Roland Series 726, non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack identified as S42.
- (e) One (1) Man-Roland Series 726, non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack identified as S43.
- (f) One (1) Man-Roland Series 327, non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute, and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack identified as S44.
- (g) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty seven

(47) inches, exhausting at two (2) stacks, identified as V06A and V06B.

- (h) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment.
- (i) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005 , identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01.
- (j) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02.
- (k) One (1) parts washer identified as PW01, constructed in 1979 with a thirty gallon capacity. One (1) parts washer identified as PW02, constructed in June 2005 has a capacity of twenty gallons. Each parts washer does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 163-18502-00097, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and EEPA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ and EEPA, within a reasonable time, any information that IDEM, OAQ and EEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and EEPA copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) an "Authorized Individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and EEPA on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and EEPA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and EEPA. IDEM, OAQ and EEPA may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 163-18502-00097 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and EEPA on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and EEPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and EEPA any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revision are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- and
- Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and EEPA or an authorized representative

to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

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

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

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to the EEPa by the date specified on the invoice.
- (b) The Permittee may call the following telephone number: (812) 435-6145 to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the

Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to 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 and EEPA, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ, and the EEPA of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and EEPA no later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and EEPA if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.8 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.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

C.10 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), the EEPA, 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 and the EEPA, 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.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or EEPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or EEPA within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

- (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, and EEPA on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and EEPA. The general public may request this information from the IDEM, OAQ and EEPA under 326 IAC 17.1.

SECTION D EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust.
- (b) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 39, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S40.
- (c) One (1) Man-Roland Series 327, non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 41, with a maximum line speed of 415 feet per minute, and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack identified as S41.
- (d) One (1) Man-Roland Series 726, non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 42, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack identified as S42.
- (e) One (1) Man-Roland Series 726, non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 43, with a maximum line speed of 583 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack identified as S43.
- (f) One (1) Man-Roland Series 327, non-heatset offset lithograph roll coating, sheet-fed printing press, identified as 44, with a maximum line speed of 415 feet per minute, and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack identified as S44.
- (g) One (1) Svecia UV screen printing press, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty seven (47) inches, exhausting at two (2) stacks, identified as V06A and V06B.
- (h) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment.
- (i) One (1) AGFA Luxel Saber VX Plate Setter, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01.
- (j) One (1) Avantra Image Setter, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02.
- (k) One (1) parts washer identified as PW01, constructed in 1979 with a thirty gallon capacity. One (1) parts washer identified as PW02, constructed in June 2005 has a capacity of twenty gallons. Each parts washer does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

(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]

D.1.1 Organic Solvent Degreasing Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, for a cold cleaning facility [parts washer (PW02)], the permittee shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**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:	Keller Crescent Company, Inc.
Address:	1100 East Louisiana Street
City:	Evansville, IN 47711
Phone #:	(812) 464-2461
MSOP #:	M163-18502-00097

I hereby certify that Keller Crescent Company, Inc. is still in operation.
 no longer in operation.

I hereby certify that Keller Crescent Company, Inc. is in compliance with the requirements of MSOP 163-18502-00097.
 not in compliance with the requirements of MSOP 163-18502-00097.

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:

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 ?____, 100TONS/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 PERM 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: _____

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
and
Evansville Environmental Protection Agency**

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

Source Background and Description

Source Name:	Keller Crescent Company, Inc.
Source Location:	1100 E. Louisiana Street, Evansville, IN 47711
County:	Vanderburgh
SIC Code:	2752
Operation Permit No.:	163-18502-00097
Operation Permit Issuance Date:	August 27, 1999
Permit Reviewer:	Alma Mifflin, Evansville EPA

The Evansville EPA and IDEM's Office of Air Quality (OAQ) have reviewed an application from Keller Crescent Company, Inc. relating to the construction and operation of a stationary commercial lithographic printing facility.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust.
- (b) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1990, identified as 39, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S39.
- (c) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S41.
- (d) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42.
- (e) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43.

- (f) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44.
- (g) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty seven (47) inches, exhausting at two (2) stacks, identified as V06A and V06B.
- (h) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment.
- (i) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01.
- (j) One (1) Avantara Image Setter constructed in 2005, identified as Avantara, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02.
- (k) One (1) parts washer identified as PW01, constructed in 1979 with a thirty gallon capacity. One (1) parts washer identified as PW02, constructed in June 2005 has a capacity of twenty gallons. Each parts washer does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

Existing Approvals

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

- (a) Municipal Certificate of Operation # 097-000-001 issued by the Evansville Environmental Protection Agency on August 27, 1999, and most current # 0788 issued on May 3, 2006.

Enforcement Issue

This proposed permit is intended to satisfy the requirements of the construction permit rules that satisfy a transition to a Minor State Operating permit from its current municipal certificate of operation.

The Evansville EPA will consult with IDEM's Compliance Branch and will initiate appropriate enforcement actions.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
V06A	UV screen press	17	0.66	442	87
V06B	UV screen press	17	1.17	2052	81
S39	Press 39	25	1.33	450	87
S41	Press 41	25	1.5	1950	87
S42	Press 42	25	1.5	2050	91
S43	Press 43	25	1.5	1950	80
S44	Press 44	25	1.5	1950	87

VPP01	AGFA	9.7	.4	NA	NA
VPP02	Avantra	11.8	.8	NA	NA

Recommendation

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

An application for the purposes of this review was received on May 2, 2002 for a Minor Source Operating Permit, with additional information received on May 28, 2004 for a permit modification.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. See Appendix A at the end of this document for detailed emission calculations.

Potential to Emit Before Controls

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.”

Pollutant	Potential to Emit (tons/yr)
PM	NA
PM-10	NA
SO ₂	NA
VOC	69
CO	NA
NO _x	NA

HAPs	Potential to Emit (tons/yr)
Ethyl benzene	0.07
Ethylene glycol	0.04
Toluene	0.03
n-Hexane	0.20
xylene	3.1
m-xylene	≤ 0.1
Methyl chloroform	≤ 0.1
Methylene chloride	≤ 0.1
Ethylene oxide	≤ 0.1
Cumene	≤ 0.1
Methyl ethyl ketone	≤ 0.1
Total	4.0

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-7.1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7.1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 applicability.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM2.5	Non-attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
1 hr. ozone	attainment
8 hr. ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment for the 1-hour and the 8-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (c) Vanderburgh County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 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.

Source Status

Existing Part 70 Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

(Pollutant	Emissions (tons/yr)
PM	0
PM-10	0
SO ₂	0
VOC	69
CO	0
NO _x	0
Hap – Xylene	3.1
Combination HAPs	4.0

- (a) This existing source is not a major stationary source because no attainment regulated 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.
- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year and it is not in one of the 28 listed source categories.
- (c) These emissions were based on the MSOP application submitted by the company, and updated emission calculations that were provided and submitted by S. Anslinger of IDEM - Office of Pollution Prevention and Technical Assistance (OPPTA).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 163-18502-00097, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by EEPA staff assigned to the source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standards (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12 and 40 CFR Part 60, Subpart QQ) are not included in this permit because all printing presses (P31, P39, P41, P42, P43, and P44) are non-heatset offset lithograph printing presses and not publication rotogravure printing presses, and therefore not subject to NSPS. The Svecia UV screen identified as 06 is a heatset offset lithograph printing press and not a rotogravure printing press, therefore it is not subject to NSPS.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing industry (326 IAC 20-18, 40 CFR Part 63,

Subpart KK) are not included in the permit for the printing presses P31, P39, P41, P42, P43, P44) because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning (326 IAC 8-3-1, CFR Part 63, Subpart T) are not included because both parts washers do not adhere to any of the definitions provided in CFR Part 63, Subpart T and the mineral spirits does not contain any of the HAPs listed in NESHAP Subpart T, therefore, 40 CFR Part 63, Subpart T does not apply.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

This source submitted an application in 2004 for an equipment modification, however, it did not trigger PSD review because the potential to emit of volatile organic compounds (VOC) does not exceed one hundred (100) tons per year, therefore 326 IAC 2-2 is not applicable to this minor source.

326 IAC 2-3 (Emission Offset)

This source was originally constructed in 1961 and is located in Vanderburgh County which has been designated as attainment for the 1-hour, and for the 8-hour ozone standard. Potential to emit of VOC in regard to ozone does not exceed one hundred (100) tons per year and therefore is not applicable to the requirements of Emission Offset, 326 IAC 2-3.

Vanderburgh County has been designated as non-attainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Keller Crescent Company, Inc. has a limited potential to emit of PM₁₀ below 100 tpy. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, 326 IAC 2-3 does not apply.

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

This source has not constructed or reconstructed a major source of hazardous air pollutants (HAPs) after July 2, 1997. The emission units identified as Press 41 and Press 44, constructed in 2004 and 1998, respectively, each have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to these emission units. Any changes to these emission units (Press 41 and Press 44) that would increase their potential to emit of a single HAP to equal to or greater than ten (10) tons per year, or a combination of HAPs to equal to or greater than twenty five (25) tons per year shall require prior approval from IDEM.

326 IAC 2-6 (Emission Reporting)

This source is located in Vanderburgh County and this source is not required to operate under a Part 70 permit (326 IAC 2-7). Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

State Rule Applicability – Individual Facilities

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

The operation of this commercial lithographic printing source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(6) this graphic arts manufacturing process that performs surface coating using roll coating is exempt from this rule.

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

Each printing press, identified as 31, 39, 41, 42, 43, 44 and 06, has been in operation since 1990, and is considered a separate facility pursuant to 326 IAC 1-2-27. Each facility does not have potential VOC emissions that exceed 25 tons or more per year, therefore 326 IAC 8-1-6 is not applicable.

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

Each facility (presses P31, P39, P41, P42, P43, P44 and 06) were constructed after January 1, 1980, and do not apply 100% coverage (saturation) of its process, therefore 326 IAC 8-2-5 does not apply to this source.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

The parts washer identified as PW01 was constructed prior to January 1, 1980 and has potential emissions less than one hundred (100) tons per year of VOC. Therefore PW01 is not subject to this rule. The parts washer identified as PW02 was constructed after January 1, 1980 and therefore is subject to 326 IAC 8-3-2.

326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

Source is located in Vanderburgh County and not one of the counties listed, therefore it is not subject to 326 IAC 8-3-5.

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

No facility at this source conducts flexographic or rotogravure operations, therefore 326 IAC 8-5-5 does not apply.

Conclusion

The operation of this commercial lithographic printing facility shall be subject to the conditions of the New Source Review and Minor Source Operating Permit 163-18502-00097.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 7/27/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
06 - UV Screen	92	47	27272

INK VOCS					
Ink Name Press Id	Maxium Coverage '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Corkure 1145HG5	0.008044	0%	80.00%	27272	0.00
		0%	80.00%	27272	0.00

Total VOC Emissions =	0.00 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

This press uses UV lights(lamps) that act as drying agent for the UV Inks.

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 20%, as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
31	506	40	127658

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	127658	0.03
CK-3166***	0.008044	57%	5.00%	127658	0.01

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.05 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.

OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

⁽¹⁾ the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
39	506	40	127658

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	127658	0.03
CK-3166***	0.008044	57%	5.00%	127658	0.01

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.05 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
 NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.
 OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

(1) the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
41	415	29	75907

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	75907	0.02
CK-3166***	0.008044	57%	5.00%	75907	0.01
		0%	0.00%	75907	0.00
		0%	0.00%	75907	0.00

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.03 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds.

METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.

OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

(1) the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
42	506	40	127658

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	127658	0.03
CK-3166***	0.008044	57%	5.00%	127658	0.01

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.05 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.

OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

(1) the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
43	583	40	147084

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	147084	0.04
CK-3166***	0.008044	57%	5.00%	147084	0.02

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.06 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
 NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.
 OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

(1) the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin
Date: 6/8/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
44	415	29	75907

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Oxidizing Offset Inks***	0.041837	25%	5.00%	75907	0.02
CK-3166***	0.008044	57%	5.00%	75907	0.01

***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

Total VOC Emissions =	0.03 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
 NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.
 OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

⁽¹⁾ the 0.05 factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Litho Printing", EPA-453/D-95-001, page 5-2.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Keller Crescent Co., Inc.
Address City IN Zip: 1100 E. Louisiana St., Evansville IN 47711
Permit Number: 163-18502-00097
Pit ID: 163-00097
Reviewer: A. Mifflin/R S Anslinger
Date: 6/15/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
44 Solvent Usage	415	29	75907
41 Solvent Usage	415	29	75907
31 Solvent Usage	506	40	127658
39 Solvent Usage	506	40	127658
42 Solvent Usage	506	40	127658
43 Solvent Usage	583	40	147084

Solvent VOCS					
	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Solvents General	0.201434	100%	100.00%	151814	15.29
Solvents General	0.201434	100%	100.00%	382973	38.57
Solvents General	0.201434	100%	100.00%	147084	14.81

Total VOC Emissions =	68.68 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY:

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OXIDIZING OFFSET INKS HAVE AN ASSUMED RETENTION OF 95%.

OTHER TYPE OF PRINTERS HAVE A FLASHOFF OF 100%.

