



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 21, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Color-Box, LLC / SPR 177-18522-00063

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, 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 according to IC 13-15-6-3, 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, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a 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);
- (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 the 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, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations 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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

April 21, 2004

Mr. Bruce Garner
Color-Box, LLC
623 South G Street
Richmond, Indiana 47374

Re: 177-18522
First Significant Permit Revision to
MSOP 177-10567-00063

Dear Mr. Garner:

Color-Box, LLC was issued a minor source operating permit on April 29, 1999 for a lithographic printing press that prints display containers. A letter requesting a revision to this permit was received on February 11, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of one (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval 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.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Wayne County
U.S. EPA, Region V
Wayne County Health Department
Air Compliance Section Inspector - DJ Knotts
Compliance Data Section
Administrative and Development

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

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

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

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

Operation Permit No.: MSOP 177-10567-00063	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 29, 1999 Expiration Date: April 29, 2004

Notice Only Change 177-12877-00063, issued on: December 19, 2000;
First Minor Permit Revision: 177-14208-00063, issued on May 10, 2001

First Significant Permit Revision: 177-14208	Pages Revised: All
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 21, 2004

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates stationary printing presses that print display containers.

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

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of 60 inches, each exhausting to stack ID # V1, V2 and V3, respectively.
- (b) One (1) starch silo, identified as S-1, with a storage capacity of 65 tons of starch, utilizing a baghouse for particulate matter control and exhausting to one (1) stack, identified as EP #1.
- (c) One (1) starch kitchen (mixer), identified as S-2, utilizing a baghouse for particulate matter control and exhausting to one (1) stack, identified as EP #2.
- (d) One (1) corrugator, identified as C-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identifies as EP #4.
- (e) One (1) laminator, identified as L-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (f) One (1) shredder, identified as SH-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (g) One (1) baler, identified as BA-1.

- (h) Two (2) die cutters, identified as DC-1 and DC-2, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (i) One (1) natural gas fired steam generator, identified as B-1, with a maximum heat input capacity of 6.2 million (MM) British thermal units (Btu) per hour, and exhausting to one stack identified as EP #3.
- (j) One (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.

SECTION B GENERAL CONSTRUCTION CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

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

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

B.5 Modification to Permit [326 IAC 2]

Notwithstanding Condition B.6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

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

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

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emissions units were constructed as proposed in the application. The emissions units covered in the New Source Construction Permit may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, 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 Phase Construction Time Frame

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, 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 an 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.6 Permit Revocation [326 IAC 2-1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

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

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

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

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

Testing Requirements

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, 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, 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 Commissioner, 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.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

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

C.11 Monitoring Methods [326 IAC 3]

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

Record Keeping and Reporting Requirements

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

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, 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 improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in

accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

- (a) Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of 60 inches, each exhausting to stack ID # V1, V2 and V3, respectively.
- (j) One (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.

Emission Limitations and Standards

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

- (a) Printing Presses, ID 1, 2, and 3 are not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as each potential VOC emissions is less than 25 tons per year. Any change or modification, from these printing presses that would increase each potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.
- (b) Printing Press, ID 4 is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as its potential VOC emissions is less than 25 tons per year. Any change or modification that would increase its potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

The printing operation is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-7 (Part 70), as it emits single HAP at less than 10 tons per year and combined HAPs at less than 25 tons per year. Any change or modification that would increase the potential HAPs emissions to 10 tons per year or greater or 25.0 tons per year or greater, respectively shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

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

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

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

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records for each printing press in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient

to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount and VOC and HAP content of each ink, coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (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

- (a) One (1) starch silo, identified as S-1, with a storage capacity of 65 tons of starch, utilizing a baghouse for particulate matter control and exhausting to one (1) stack, identified as EP #1.
- (b) One (1) starch kitchen (mixer), identified as S-2, utilizing a baghouse for particulate matter control and exhausting to one (1) stack, identified as EP #2.
- (c) One (1) corrugator, identified as C-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identifies as EP #4.
- (d) One (1) laminator, identified as L-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (e) One (1) shredder, identified as SH-1, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (f) One (1) baler, identified as BA-1.
- (g) Two (2) die cutters, identified as DC-1 and DC-2, utilizing an air separator/air screen (identified as S-3) for particulate matter control and exhausting to one (1) stack, identified as EP #4.
- (h) One (1) natural gas fired steam generator, identified as B-1, with a maximum heat input capacity of 6.2 million (MM) British thermal units (Btu) per hour, and exhausting to one stack identified as EP #3.

(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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) The particulate matter (PM) from the starch silo (identified as S-1) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The particulate matter (PM) from the starch kitchen (identified as S-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (c) The particulate matter (PM) from the corrugator (C-1), laminator (identified as L-1), shredder (identified as SH-1) and the two (2) die cutters (identified as DC-1 and DC-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the corrugator (C-1)/laminator (L-1) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

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

D.2.3 Particulate Matter (PM)

- (a) The baghouse for PM control shall be in operation at all times when the starch silo (identified as S-1) is in operation.
- (b) The baghouse for PM control shall be in operation at all times when the starch kitchen (identified S-2) is in operation.
- (c) The air separator/air screen (identified as S-3) for PM control shall be in operation at all times when the corrugator (C-1), laminator (identified as L-1), shredder (SH-1) and the two (2) die cutters (identified as DC-1 and DC-2) are in operation.

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

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the starch silo (S-1), starch kitchen (S-2), corrugator (C-1), laminator (L-1), shredder (SH-1) and two (2) die cutters (DC-1 and DC-2) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the starch silo (S-1), at least once per shift when the starch silo (S-1) is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the starch kitchen (S-2), at least once per shift when the starch kitchen (S-2) is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (c) The Permittee shall record the total static pressure drop across the air separator/air screen (identified as S-3) used in conjunction with the corrugator (C-1), laminator (L-1), shredder (SH-1) and the two (2) die cutters (DC-1 and DC-2) at least once per shift when the corrugator (C-1), laminator (L-1), shredder (SH-1) and the two (2) die cutters (DC-1 and DC-2) are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the starch silo (S-1), starch kitchen (S-2), corrugator (C-1), laminator (L-1), shredder (SH-1) and the two (2) die cutters (DC-1 and DC-2) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency

Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the starch silo (S-1), starch kitchen (S-2), corrugator (C-1), laminator (L-1), shredder (SH-1) and two (2) die cutters (DC-1 and DC-2) stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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:	Color-Box, LLC
Address:	10556 Industries Road
City:	Richmond
Phone #:	(765) 966-9783
MSOP #:	177-10567-00063

I hereby certify that **Color-Box, LLC** is still in operation.

no longer in operation.

I hereby certify that **Color-Box, LLC** is

in compliance with the requirements of **MSOP177-10567-00063**.

not in compliance with the requirements of **MSOP 177-10567-00063**.

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:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision

Source Background and Description

Source Name: Color-Box, LLC
Source Location: 1056 Industries Road, Richmond, Indiana 47374
County: Wayne
SIC Code: 2752
1st Significant Permit Revision: 177-18522
Operating Permit No.: MSOP 177-10567-00063
Issuance Date: April 29, 1999
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a revision application from Color-Box, LLC, a plant that prints display containers, relating to the operation and construction of the following new printing press:

- (a) One (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
V4	Printing Press #4	48	1.00	2000	ambient

Existing Approvals

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

- (a) Minor Source Operating Permit, MSOP 177-10567-00063, issued on April 29, 1999;
- (b) Notice-only-Change, NOC 177-12877, issued on December 19, 2000; and
- (c) Minor Permit Modification, M.M. 177-14208, issued on May 10, 2001.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the revision is 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 administratively complete application for the purposes of this review was received on February 11, 2004. Additional information was received on February 26, 2004; February 27, 2004; and March 5, 2004.

Emission Calculations

- (a) New Lithographic Printing Press, identified as ID No. Press 4:

Production

Maximum Line Speed	-	262.5 feet/minute
Maximum Width-	65 inches	
Maximum Production	-	85,313 square feet/hour
Maximum Throughput	-	8,500 size sheets per hour

Material Usage:

(1)	Ink Usage	=	6,500 sheets/hr * 4 lbs/1000 sheets
		=	26 lbs ink/hr
(2)	Aqueous Coating	=	6,500 sheets/hr * 6.5 lbs/1000 sheets
		=	42.25 lbs coating/hr
(3)	Blanket Wash	=	93 gallons/month
(4)	Fountain Solution	=	109.2 gallons/month
(5)	Metering Roll Cleaner	=	12.6 gallons/month
(6)	Alcohol	=	4 gallons/month

Material	Material Usage		VOC Content	Percentage Flash Off	Uncontrolled VOC PTE (lb/hr)	Uncontrolled VOC PTE (tons/year)
Ink ***	26.0	lbs/hr	40.00 % - VOC by Weight	5 %	0.52	2.3
Coating	42.3	lbs/hr	4.00 % - VOC by Weight	100 %	1.69	7.40
Blanket Wash	93.0	gallon/month	6.71 lbs VOC/gal	100 %	0.86	3.76
Fountain Solution	109.2	gallon/month	3.21 lbs VOC/gal	100%	0.48	2.10
Metering Roll Cleaner	12.6	gallon/month	4.93 lbs VOC/gal	100 %	0.09	0.37
Alcohol	4.0	gallon/month	6.51 lbs VOC/gal	100%	0.04	0.17
TOTAL					3.68	16.1

Material	HAP	Material Usage		HAP Content	Percentage Flash Off	Uncontrolled HAP PTE (lb/hr)	Uncontrolled HAP PTE (tons/yr)
Coating	Glycol Ether	42.3	lbs/hr	0.20% - HAP by Weight	100 %	0.085	0.37
Blanket Wash	Xylene	93.0	gallon/month	0.1779 lbs HAP/gal	100 %	0.022	0.10
	Cumene			0.1403 lbs HAP/gal	100 %	0.02	0.08
Fountain Solution	Ethylene Glycol	109.2	gallon/month	0.79 lbs HAP/gal	100%	0.12	0.53
	Glycol Ether			0.76 lbs HAP/gal	100%	0.115	0.50
Metering Roll Cleaner	Methylene Chloride	12.6	gallon/month	1.87 lbs HAP/gal	100 %	0.033	0.144
Combined HAPs						0.395	1.72
Worst Single HAP (Glycol Ether)						0.12	0.87

Note: *** - worst emitting ink

Methodology:

VOC & HAPs Emissions = Material Usage, lb/hr * % VOC or HAP by wt. * flash off * 8760 hrs/yr * ton/2000 lb
 = Material Usage, gal/month * VOC or HAP content, lb/gal * 12 month/yr * ton/2000 lb * flash off

Potential To Emit

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	16.1
CO	0.0
NO _x	0.0

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

HAP's	Potential To Emit (tons/year)
Ethylene Glycol	0.53
Glycol Ether	0.87
Xylene	0.10
Cumene	0.08
Methylene Chloride	0.144
TOTAL Combined HAPs	1.72
Worst Single HAP	0.87

- (a) This modification involves a relaxation of the limit and reporting requirements in the issued MSOP. There are no sections in 326 IAC 2-6.1 (MSOP) that address relaxation of applicable requirements. Pursuant to IDEM, OAQ's policy, any relaxation of applicable requirements is subject to a Significant Permit Revision.

Source Status

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

Pollutant	Emissions (tons/yr)	Corrected Emissions (tons/yr)	Emissions (1 st Minor Permit Revision 177-14208) (tons/yr)	TOTAL Emissions (tons/year)
PM	0.0	0.0	3.30	3.30
PM-10	0.0	0.0	3.46	3.46
SO ₂	0.0	0.0	0.02	0.02
VOC	68.18 *	48.3 **	23.04	71.34
CO	0.0	0.0	2.28	2.28
NO _x	0.0	0.0	2.72	2.72
Single HAP	3.48	2.61	2.66	5.27
Combination	6.89	5.16	5.67	10.83

HAPs				
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* - This VOC emission was taken from MSOP 177-10567-00063, issued on April 29, 1999, which was incorrectly based on 100% flash off of the ink. Since the presses at the source are non-heatset offset lithographic printing presses, 95% of the ink is retained in the substrate and only 5% is flashed off, pursuant to the draft EPA's guideline series "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing".

** - corrected VOC emission based on 5% flash off.

TOTAL Emissions = Sum of the Corrected Emissions + Emissions from the 1st Minor Permit Revision.

- (a) This existing 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.

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	Attainment
SO ₂	Maintenance
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	not determined

- (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. Wayne County has been designated as attainment or unclassifiable for ozone.

Potential To Emit After Issuance of Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Process/facility	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NOx	HAPs
New Press #4	0.0	0.0	0.0	16.1	0.0	0.0	1.72
PSD Threshold	250	250	250	250	250	250	250
Existing Source PTE	3.30	3.46	0.02	71.34	2.28	2.72	10.83
Source PTE After the Modification	3.30	3.46	0.02	87.44	2.28	2.72	12.55

- (a) This modification to an existing minor stationary source is not major because no pollutant is emitted at a rate of 250 tons per year or greater (PSD threshold). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (c) New Source Performance Standard, 326 IAC 12, (40 CFR Part 60):
 - (1) 326 IAC 12, (40 CFR 60.430, Subpart QQ - The one (1) new non-heatset offset lithographic printing press is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), as it is not a rotogravure printer.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):
 - (1) 40 CFR 63.820, Subpart KK - National Emission Standards for Printing and publishing Industry. The one (1) new non-heatset offset lithographic printing press is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820, Subpart KK), as it is not emitting single HAP at 10 tons per year or greater nor emitting combined HAPs at 25 tons per year or greater and it is not a rotogravure or flexographic printing press.
 - (2) 40 CFR Part 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants for Printing, Coating and Dyeing of Fabric and other Textiles. The one (1) new non-heatset offset lithographic printing press is not subject to the requirements of this NESHAP, as it is not used for printing fabric or other textiles.
 - (3) 40 CFR Part 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants for Paper and Web Coating. The one (1) new non-heatset offset lithographic printing press is not subject to the requirements of this NESHAP, as it is not used for paper coating nor web coating.

State Rule Applicability - Entire Source

- (a) 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:
 - (1) 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.
 - (2) 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

- (a) 326 IAC 2-4.1-1 (New Source Toxics Control)
This new non-heatset offset lithographic printing press, ID Press 4 is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control), as it is not emitting single HAP at 10 tons per year nor emitting combined HAPs at 25 tons per year.
- (b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to facilities existing as of January 1, 1980 and have potential VOC emissions of 25 tons per year or more and are not subject to any other 8 rules shall reduce VOC emissions using Best Available Control Technology (BACT). The new non-heatset offset lithographic printing press, ID Press 4 has a potential VOC emissions of less than 25 tons per year. Therefore, it is not subject to the requirements of 326 IAC 8-

1-6 (New Facilities; General Reduction Requirements).

- (c) 326 IAC 8-5-5 (Graphic Arts Operations)
The new non-heatset offset lithographic printing press, ID Press 4 is not subject to 326 IAC 8-5-5 (Graphic Arts Operation), as it is not a packaging rotogravure, publication rotogravure and flexographic printing unit.
- (d) 326 IAC 8-2-5 (Paper Coating Operations)
The new non-heatset offset lithographic printing press, ID Press 4 is not subject to 326 IAC 8-2-5 (Paper Coating Operations), as it is not used for paper coating.
- (e) 326 IAC 8 (Volatile Organic Compound Source)
There are no other rules in article 326 IAC 8 that applies to this press.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The new non-heatset offset lithographic printing press, ID Press 4 does not have compliance monitoring requirements.

MSOP Revision

The new printing press, ID 4 will be incorporated in the MSOP as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

- (1) *Press 4 will be added in Section A.2 and Section D.1 and be numbered as item (j):*
 - (j) **One (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.**

Section D.1

Emissions unit Description

- (a) Three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3), with a maximum line speed of 262.5 feet per minute and a maximum print width of ~~60~~ **65** inches, each exhausting to stack ID # V1, V2 and V3, respectively.
- (j) **One (1) non-heatset offset lithographic printing press (ID No. Press 4), with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, exhausting to stack ID # V4.**

- (2) *The individual VOC PTE of 22.7 tons/year as calculated in the issued MSOP 177-10567-00063 for*

the existing three (3) non-heatset offset lithographic printing presses (ID No. Press 1, 2, and 3, was calculated based on 100% flash off for the ink, instead of 5% flash off, and was not based on the worst emitting ink. This VOC PTE was recalculated using the new press VOC PTE of 16.1 tons/year, as the existing three presses are identical to the new press (see detailed calculation on page 3 of this TSD. These presses are naturally below the VOC potential of 25 tons per year for the applicability of 326 IAC 8-1-6, therefore, it should not have a limit and reporting requirements as conditions to avoid this rule. Condition 1 will be revised into a soft limit as follows:

Emission Limitations and Standards

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

- (a) ~~The amount of VOC delivered to each of the applicators of the non-heatset web offset lithographic printing presses shall be less than 25 tons per year. **Printing Presses, ID 1, 2, and 3 are not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as each potential VOC emissions is less than 25 tons per year.** Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification, from these non-heatset web offset lithographic printing presses that would increase in each potential VOC emissions to more than 25.0 tons per year or greater for each press, shall obtain require prior approval from the Office of Air Management Quality (OAM Q), as required by 326 IAC 2-1.1 before such change can may occur.~~
- (b) **Printing Press, ID 4 is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as its potential VOC emissions is less than 25 tons per year. Any change or modification that would increase its potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.**
- (3) *The following condition will be added in the MSOP:*

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

The printing operation is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-7 (Part 70), as it emits single HAP at less than 10 tons per year and combined HAPs at less than 25 tons per year. Any change or modification that would increase the potential HAPs emissions to 10 tons per year or greater or 25.0 tons per year, respectively shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

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

D.1.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records for **each printing press** in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC and HAP content of each ink, coating material and solvent used Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and

- (5) The weight of VOCs **and HAPs** emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (4) *Each press VOC potential emission is naturally below 25 tons per year, therefore, the following reporting condition to establish compliance with 326 IAC 8-1-6 in the MSOP is not necessary. Therefore, the following condition and the reporting form on Page 14 of 14 of the MSOP will be deleted:*

~~D.1.4 Reporting Requirements~~

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

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

Quarterly Report

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

Year: _____

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

(5) Subsequent conditions and section will be re-numbered accordingly.

(6) *The Annual Notification Report will be added in the MSOP, as it was not included in the issued MSOP:*

**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:	Color-Box, LLC
Address:	10556 Industries Road
City:	Richmond
Phone #:	(765) 966-9783
SPR #:	177-18522-00063

I hereby certify that **Color-Box, LLC** is still in operation.

no longer in operation.

I hereby certify that **Color-Box, LLC** is

in compliance with the requirements of SPR **177-18522-00063**.

not in compliance with the requirements of SPR **177-18522-00063**.

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:

Conclusion

The construction and operation of this operation of this new non-heatset offset lithographic printing press, ID Press 4 shall be subject to the conditions of the attached **1st Significant Permit Revision 177-18522**.