

September 24, 2004

Certified Mail: 7000 0600 0023 5188 1706

Mr. Michael Herndon
Poster Display Company
5650 Elmwood Avenue
Indianapolis, IN 46203

Re: Poster Display Company, 097-20010-00182

Dear Mr. Herndon:

The application from Poster Display Company, received on August 26, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following operation of silk screen printing, located at 5650 Elmwood Avenue, Indianapolis, Indiana 46203, is classified as exempt from air pollution permit requirements:

- (a) One (1) four-color screen press, identified as 4C, installed in 1994, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (b) One (1) six-color screen press, identified as 6C, installed in 1998, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (c) One (1) one-color screen press, identified as Viking, installed in 1992, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (d) One (1) digital press, identified as Digital, installed in 2003, with a maximum line speed of 7.5 feet per minute, using no control, and exhausting to the atmosphere.
- (e) One (1) five-color screen press, identified as 5C, installed in 2004, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.

The following conditions shall be applicable:

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:

- (1) 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.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oligier at 327-2846 or aoliger@indygov.org.

Sincerely,

John B. Chavez
Administrator

aco

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Poster Display Company
Source Location: 5650 Elmwood Avenue, Indianapolis, Indiana 46203
County: Marion
SIC Code: 2759
Operation Permit No.: 097-20010-00182
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Poster Display Company relating to the operation of silk screen printing.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) four-color screen press, identified as 4C, installed in 1994, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (b) One (1) six-color screen press, identified as 6C, installed in 1998, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (c) One (1) one-color screen press, identified as Viking, installed in 1992, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.
- (d) One (1) digital press, identified as Digital, installed in 2003, with a maximum line speed of 7.5 feet per minute, using no control, and exhausting to the atmosphere.
- (e) One (1) five-color screen press, identified as 5C, installed in 2004, with a maximum line speed of 21 feet per minute, using no control, and exhausting to the atmosphere.

Existing Approvals

The source has constructed or has been operating under Operating Permit 5158, issued September 20, 1990.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application.

A complete application for the purposes of this review was received on August 26, 2004.

Emission Calculations

See Appendix A (one page) of this document for detailed emissions calculations.

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO ₂	negligible
VOC	0.64
CO	negligible
NO _x	negligible
Single HAP	negligible
Total HAPs	negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1 (29)) of the above pollutants are less than the levels listed in 326 IAC 2-1.1.3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (b) 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 and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. 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.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	negligible
PM10	negligible
SO ₂	negligible
VOC	0.64
CO	negligible
NO _x	negligible
Single HAP	negligible
Combination	negligible

- (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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) incorporated into this permit. Because this source does not use rotogravure printing, 40 CFR Part 60 Subpart QQ does not apply to the facility.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) incorporated into this permit. Because this source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK (National Emissions Standards for the Printing and Publishing Industry) and 40 CFR Part 63 Subpart JJJJ (National Emissions Standard for Paper and Other Web Surface Coating Operations) do not apply to the facility.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

This source is not subject to 326 IAC 1-6, because the source is not required to obtain a permit under 326 IAC 2.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-1 (Nonattainment Area Limitations)

Since the source does not have the potential to emit greater than 100 tons per year of particulate matter, or actual emissions of greater than 10 tons per year of particulate matter, and it is not one of the sources listed in 326 IAC 6-1-12, 326 IAC 6-1 does not apply.

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

This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit is less than twenty-five (25) tons per year or ten (10) pounds per hour of Sulfur Dioxide.

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

This source has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

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

Although this source involves saturation processes of paper, it is not subject to 326 IAC 8-2-5 (Paper Coating Operations) because potential VOC emissions are less than fifteen (15) pounds per day (lb/day) (2.7 tons per year).

Conclusion

This operation of the silk screen printing system shall be exempt from air pollution permit requirements by exemption 097-20010-00182.

Appendix A: Emissions Calculations

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Company Name: Poster Display Company
Address City IN Zip: 5650 Elmwood Avenue
Permit #: 097-20010-00182
Reviewer: Angelique Oliger
Date: September 3, 2004

Total Coating Purchased in 2003:	7013 gallons
Total 2003 hours of operation:	4784 hours
Highest VOC coating (3269 Green):	0.1 lb VOC / gallon
Potential VOC emissions (tons/yr)*:	0.64 tons/yr

*Assuming all coating used is worst case 3269 Green:
(tons/yr) = gallons purchased in 2003 * 8760 hrs/yr / 4784 hrs in 2003 * lb VOC / gallon * 1 ton / 2000 lbs

This source does not use coatings containing HAPs.

