



**MINOR SOURCE OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Pratt Corporation
3035 North Shadeland Avenue
Indianapolis, Indiana 46226**

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

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

Operation Permit No.: MSOP 097-20182-00548	
Issued by:	Issuance Date: February 28, 2005
Original Signed by John B. Chavez	Expiration Date: February 28, 2010
John B. Chavez, Administrator Indianapolis Office of Environmental Services	

**Department of Public Works
Office of Environmental Services**
2700 South Belmont Avenue (317) 327-2234
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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 Indianapolis Office of Environmental Services (OES). 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 screen and digital printing.

Authorized Individual: David Pratt
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: P.O. Box 18179, Indianapolis, Indiana 46218
General Source Phone: (317) 524-3217
SIC Code: 2759
County Location: Marion County
Source Location Status: Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants.
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Five (5) screen printing presses, identified as SP1-1A&B, SP1-2A&B, SP1-3A&B, SP1-4A&B, and SP1-5A&B, to be installed in 2005, using no control, and exhausting to stacks 1-1A&B, 1-2A&B, 1-3A&B, 1-4A&B, and 1-5A&B, respectively with a combined maximum throughput of 95 sfm (square feet per minute).
- (b) Five (5) screen printing presses, identified as SP2-1A&B, SP2-2A&B, SP2-3A&B, SP2-4A&B, and SP2-5A&B, to be installed in 2005, using no control, and exhausting to stacks 2-1A&B, 2-2A&B, 2-3A&B, 2-4A&B, and 2-5A&B, respectively, with a combined maximum throughput of 104 sfm (square feet per minute).
- (c) One (1) screen printing press, identified as SP-PatII, to be installed in 2005, using no control, and exhausting to stack PatIIA&B, with a maximum throughput of 53 sfm (square feet per minute).
- (d) One (1) screen printing presses, identified as SP-PatIAB, to be installed in 2005, using no control, and exhausting to stacks Pat1A, and Pat1B with a maximum throughput of 53 sfm (square feet per minute).
- (e) One (1) screen printing presses, SP-Eclipse1AB, to be installed in 2005, using no control, and exhausting to stacks M&R-EclipseA, and M&R-EclipseB with a maximum throughput of 28 sfm (square feet per minute).
- (f) One (1) screen printing press, identified as SP-M&R, to be installed in 2005, using no control, and exhausting to stack M&R-A, with a maximum throughput of 63 sfm (square feet per minute).
- (g) One (1) screen printing press, identified as SP-Conquest, to be installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 68

sfm (square feet per minute).

- (h) Six (6) screen printing presses, identified as SP3-1A&B, SP3-2A&B, SP3-3A&B, SP3-4A&B, SP3-5A&B, and SP3-6A&B, to be installed in 2005, using no control, and exhausting to stacks 3-1A&B, 3-2A&B, 3-3A&B, 3-4A&B, 3-5A&B, 3-6A&B, respectively, with a combined maximum throughput of 94 sfm (square feet per minute).
- (i) One (1) digital printing presses, installed in 2004, identified as Vutek, using no control, and exhausting to stack Digital with a maximum throughput of 3 sfm (square feet per minute).
- (j) One (1) digital printing presses, installed in 2004, identified as Inca, using no control, and exhausting to stack Digital with a maximum throughput of 93 sfm (square feet per minute).

SECTION B GENERAL 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 operate 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, 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.3 Effective Date of the Permit [IC 13-15-5-3]

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

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

B.7 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, 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; 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, P. O. Box 6015
Indianapolis, Indiana 46206

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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
- and
- Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 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, OES, and 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) 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 this title or the conditions of this permit or any operating permit revisions;
- (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 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) 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, at reasonable times, 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.10 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, and OES, Air Permits, 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, and OES 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.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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 OES, 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]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3). All required notifications shall be submitted to:

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

and

Indianapolis OES
Air Enforcement
2700 South Belmont Ave.
Indianapolis, IN 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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, and OES.

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES 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 IDEM commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 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

C.9 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 IDEM, OAQ, and OES 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 IDEM, OAQ, and OES 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).
- (b) 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.10 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 IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 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, P. O. Box 6015
Indianapolis, Indiana 46206

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (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 OES on or before the date it is due.

- (c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not 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.

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) Five (5) screen printing presses, identified as SP1-1A&B, SP1-2A&B, SP1-3A&B, SP1-4A&B, and SP1-5A&B, to be installed in 2005, using no control, and exhausting to stacks 1-1A&B, 1-2A&B, 1-3A&B, 1-4A&B, and 1-5A&B, respectively with a combined maximum throughput of 95 sfm (square feet per minute).
- (b) Five (5) screen printing presses, identified as SP2-1A&B, SP2-2A&B, SP2-3A&B, SP2-4A&B, and SP2-5A&B, to be installed in 2005, using no control, and exhausting to stacks 2-1A&B, 2-2A&B, 2-3A&B, 2-4A&B, and 2-5A&B, respectively, with a combined maximum throughput of 104 sfm (square feet per minute).
- (c) One (1) screen printing press, identified as SP-PatII, to be installed in 2005, using no control, and exhausting to stack PatIIA&B, with a maximum throughput of 53 sfm (square feet per minute).
- (d) One (1) screen printing presses, identified as SP-PatIAB, to be installed in 2005, using no control, and exhausting to stacks Pat1A, and Pat1B with a maximum throughput of 53 sfm (square feet per minute).
- (e) One (1) screen printing presses, SP-Eclipse1AB, to be installed in 2005, using no control, and exhausting to stacks M&R-EclipseA, and M&R-EclipseB with a maximum throughput of 28 sfm (square feet per minute).
- (f) One (1) screen printing press, identified as SP-M&R, to be installed in 2005, using no control, and exhausting to stack M&R-A, with a maximum throughput of 63 sfm (square feet per minute).
- (g) One (1) screen printing press, identified as SP-Conquest, to be installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 68 sfm (square feet per minute).
- (h) Six (6) screen printing presses, identified as SP3-1A&B, SP3-2A&B, SP3-3A&B, SP3-4A&B, SP3-5A&B, and SP3-6A&B, to be installed in 2005, using no control, and exhausting to stacks 3-1A&B, 3-2A&B, 3-3A&B, 3-4A&B, 3-5A&B, 3-6A&B, respectively, with a combined maximum throughput of 94 sfm (square feet per minute).
- (i) One (1) digital printing presses, installed in 2004, identified as Vutek, using no control, and exhausting to stack Digital with a maximum throughput of 3 sfm (square feet per minute).
- (j) One (1) digital printing presses, installed in 2004, identified as Inca, using no control, and exhausting to stack Digital with a maximum throughput of 93 sfm (square feet per minute).

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

There are no applicable conditions for these facilities.

Any change or modification which would increase VOC emission potential to greater than 25 tons per year, a single HAP emission potential to greater than 10 tons per year, or a combination of HAPs emission potential to greater than 25 tons per year may require prior approval from IDEM, OAQ before such change can occur.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
and
Indianapolis OES
Air Compliance**

**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:	Pratt Corporation
Address:	3035 North Shadeland Avenue
City:	Indianapolis, Indiana 46226
Phone #:	(317) 524-3217
MSOP #:	097-20182-00548

I hereby certify that Pratt Corporation is

- still in operation.
 no longer in operation.

I hereby certify that Pratt Corporation is

- in compliance with the requirements of MSOP 097-20182-00548.
 not in compliance with the requirements of MSOP 097-20182-00548.

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
Compliance Data Section
FAX NUMBER – 317-233-5967
and
Indianapolis OES
Air Compliance
FAX NUMBER – 317-327-2274

MALFUNCTION REPORT

PAGE 1 OF 2

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 ____/____/19____ _____ 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: _____

***SEE PAGE 2**

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
City of Indianapolis
Office of Environmental Services**

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

Source Background and Description

Source Name: Pratt Corporation (Previously Pratt Poster)
Source Location: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
County: Marion
SIC Code: 2759
Operation Permit No.: 097-20182-00548
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Pratt Corporation relating to a screen and digital printing operation. This operation was previously located at 3001 East 30th Street, Indianapolis, Indiana 46218 and operated under the name Pratt Poster.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) Five (5) screen printing presses, identified as SP1-1A&B, SP1-2A&B, SP1-3A&B, SP1-4A&B, and SP1-5A&B, to be installed in 2005, using no control, and exhausting to stacks 1-1A&B, 1-2A&B, 1-3A&B, 1-4A&B, and 1-5A&B, respectively with a combined maximum throughput of 95 sfm (square feet per minute).
- (b) Five (5) screen printing presses, identified as SP2-1A&B, SP2-2A&B, SP2-3A&B, SP2-4A&B, and SP2-5A&B, to be installed in 2005, using no control, and exhausting to stacks 2-1A&B, 2-2A&B, 2-3A&B, 2-4A&B, and 2-5A&B, respectively, with a combined maximum throughput of 104 sfm (square feet per minute).
- (c) One (1) screen printing press, identified as SP-PatII, to be installed in 2005, using no control, and exhausting to stack PatIIA&B, with a maximum throughput of 53 sfm (square feet per minute).
- (d) One (1) screen printing presses, identified as SP-PatIAB, to be installed in 2005, using no control, and exhausting to stacks Pat1A, and Pat1B with a maximum throughput of 53 sfm (square feet per minute).
- (e) One (1) screen printing presses, SP-Eclipse1AB, to be installed in 2005, using no control, and exhausting to stacks M&R-EclipseA, and M&R-EclipseB with a maximum throughput of 28 sfm (square feet per minute).
- (f) One (1) screen printing press, identified as SP-M&R, to be installed in 2005, using no control, and exhausting to stack M&R-A, with a maximum throughput of 63 sfm (square feet per minute).

- (g) One (1) screen printing press, identified as SP-Conquest, to be installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 68 sfm (square feet per minute).
- (h) Six (6) screen printing presses, identified as SP3-1A&B, SP3-2A&B, SP3-3A&B, SP3-4A&B, SP3-5A&B, and SP3-6A&B, to be installed in 2005, using no control, and exhausting to stacks 3-1A&B, 3-2A&B, 3-3A&B, 3-4A&B, 3-5A&B, 3-6A&B, respectively, with a combined maximum throughput of 94 sfm (square feet per minute).
- (i) One (1) digital printing presses, installed in 2004, identified as Vutek, using no control, and exhausting to stack Digital with a maximum throughput of 3 sfm (square feet per minute).
- (j) One (1) digital printing presses, installed in 2004, identified as Inca, using no control, and exhausting to stack Digital with a maximum throughput of 93 sfm (square feet per minute).

Existing Approvals

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

OP 5160-0001 (Pratt Poster), issued on July 30, 1998.

All conditions from previous approvals were incorporated into this permit.

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 and additional information submitted by the applicant.

An administratively incomplete application for the purposes of this review was received on September 29, 2004. Additional information completing the application was received on December 28, 2004.

Emission Calculations

See Appendix A (three pages) 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	43.13
CO	negligible
NO _x	negligible

HAP	Potential To Emit (tons/year)
Glycol ether	7.86
Ethyl benzene	0.46
Dichloromethane	0.31
Tetrachloroethylene	0.06
Combination of HAPs	8.69

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1-1.1(16)) 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 HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOCs) is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (d) 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 (NO_x) 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 NO_x 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 NO_x 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

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO ₂	negligible
VOC	43.13
CO	Negligible
NO _x	Negligible
Single HAP	7.86
Combination of HAPs	8.69

- (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 more, 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.

- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons or greater per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new 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.

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

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not subject to 326 IAC 2-1.1-5 because it has the potential to emit less than 100 tons of NO_x and less than 100 tons of VOC per year.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

326 IAC 2-4.1 (Major Sources of 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, and it is not located in Lake or Porter Counties.

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%) 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.

326 IAC 6-1(Nonattainment Area Limitations)

This rule does not apply to this source because actual emissions of particulate are less than ten (10) tons per year, and the potential to emit of particulate is less than one hundred (100) tons per year, and it is not a specifically listed source in 326 IAC 6.

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 of each individual unit has the potential to emit less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

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

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

326 IAC 8-2-1 (Surface Coating Emission Limitations)

Although this source involves the coating of paper, it is not subject to 326 IAC 8-2-5 (Paper Coating Operations) because no individual facility has the potential to emit twenty-five (25) or greater tons of VOC per year, or actual emissions of fifteen (15) or greater pounds of VOC per day (lb/day) (2.7 tons per year).

Conclusion

This screen and digital printing operation shall be subject to the conditions of the attached Minor Source Operating Permit 097-20182-00548.

**Appendix A: Emissions Calculations for automatic press
VOC and HAP From Printing Press Operations**

Company Name: Pratt Corporation
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: 097-20182-00548
Reviewer: Angelique Oliger
Date: September 30, 2004

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
1. Vutek	0.506	79	252
2. Inca	23.2	48	7024

INK VOCS							
Ink Name	Maxium Coverage	Weight % Volatiles*	Weight % Glycol Ether	Flash Off %	Throughput	VOC Emissions	Glycol Ether Emissions
Press Id	(lbs/MMin ²)				(MMin ² /Year)	(TONS/YEAR)	(TONS/YEAR)
1. Vutek Ink	61.722	89%	80%	100.00%	252	6.96	6.22
1. Vutek Head Cleaner	4.435	100%	100%	100.00%	0	0.00	0.00
2. Sericol Uvantage U.V. Ink	20	0%	0%	100.00%	7024	0.00	0.00

Total Emissions =	6.96	6.22
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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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations for automatic press
VOC and HAP From Printing Press Operations**

Company Name: Pratt Corporation
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: 097-20182-00548
Reviewer: Angelique Olinger
Date: September 30, 2004

INK USAGE

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
1. SP1-1A&B thru SP1-5A&B	21.19	54	7217
2. SP2-1A&B thru SP2-5A&B	20.83	60	7883
3. SP3-1A&B thru SP3-6A&B	17.87	63	7101
4. SP-Conquest	20.85	39	5129
5. SP-PatIA and SP-PatIB	12.17	51.96	3988
6. SP-PatII	12.17	51.96	3988
7. SP-M&R	16.54	45.96	4795
8. SP-Eclipse1A and SP-Eclipse 1B	11.1	30	2100

INK VOCs							
Ink Name (worst case) Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Weight % ethyl benzene	Flash Off %	Throughput (MMin ² /Year)	VOC Emissions (TONS/YEAR)	HAP Emissions (TONS/YEAR)
1. Nazdar 3200	56	3%	0.05%	100.00%	7217	6.53	0.10
2. Nazdar 3200	56	3%	0.05%	100.00%	7883	7.13	0.11
3. Nazdar 3200	56	3%	0.05%	100.00%	7101	6.42	0.10
4. Nazdar 3200	56	3%	0.05%	100.00%	5129	4.64	0.07
5. Nazdar 3200	20	3%	0.05%	100.00%	3988	1.29	0.02
6. Nazdar 3200	20	3%	0.05%	100.00%	3988	1.29	0.02
7. Nazdar 3200	20	3%	0.05%	100.00%	4795	1.55	0.02
8. Nazdar 3200	20	3%	0.05%	100.00%	2100	0.68	0.01

Total Emissions =	29.54	0.46
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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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations for Manual Presses

Company Name: Pratt Corporation
 Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
 Permit #: 097-20182-00548
 Reviewer: Angelique Oliger
 Date: September 30, 2004

	Usage per screen (gallons)	Density (lbs/gal)	VOC wt. %	VOC PTE (tons/yr)**	Glycol Ether wt. %	Glycol Ether PTE (tons/yr)	Dichloro-mehtane wt. %	Dichloro-mehtane PTE (tons/yr)	Tetra-chloro-ethylene wt. %	Tetra-chloro-ethylene PTE (tons/yr)	Total HAP PTE (tons/yr)
Screen Chemicals (solvents)											
ICC 8198 Spray/Wipe	0.069	6.7	43%	2.10	15%	0.73					0.73
857 Spray and Wipe	0.035	8.33	26%	0.80	30%	0.91					0.91
XID-505 Ink Degradent	0.041	8.45	91%	3.31							0.00
Spiff Cleaner	0.004	10.58	100%	0.42			75%	0.31	15%	0.06	0.38

VOC PTE (tons/yr) = 6.63

HAP PTE (tons/yr) = 2.01

VOC (Tons/Year) = Usage per screen (gallons) * 20,986 maximum screens per year * density (lbs/gallon) * Weight % volatiles * 1 Ton / 2000 pounds

HAPs (Tons/Year) = Usage per screen (gallons) * 20,986 maximum screens per year * density (lbs/gallon) * Weight % HAP * 1 Ton / 2000 pounds