



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: November 3, 2005
RE: Metropolitan Printing Services / 105-20382-00036
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 1/10/05



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Indianapolis, Indiana 46204-2251
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MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Metropolitan Printing Services
720 South Morton Street
Bloomington, Indiana 47403**

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

Operation Permit No.: MSOP 105-20382-00036	
Original signed by: Paul Dubenetzky, Assistant Commissioner Permits Branch Office of Air Quality	Issuance Date: November 3, 2005 Expiration Date: November 3, 2010



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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial printing plant.

Authorized Individual: President
Source Address: 720 South Morton Street, Bloomington, Indiana 47403
Mailing Address: 720 South Morton Street, Bloomington, Indiana 47403
General Source Phone: (812) 332-7279
SIC Code: 2752
County Location: Monroe
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD 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) One (1) Heidelberg non-heatset lithographic sheet-fed printing press, identified as P1, constructed in 1993, with a maximum line speed of 443.33 feet per minute, and maximum printing width of 40 inches.
- (b) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P2, constructed in 1994, with a maximum line speed of 358.33 feet per minute, and maximum printing width of 28 inches.
- (c) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P3, constructed in 2000, with a maximum line speed of 583.33 feet per minute, and maximum printing width of 40 inches.
- (d) One (1) Heidelberg Quickmaster non-heatset lithographic sheet-fed printing press, identified as P7, constructed in 2001, with a maximum line speed of 124.58 feet per minute, and maximum printing width of 18 inches.

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 [IC13-15-5-3]

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
Indianapolis, Indiana 46204-2251
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

B.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
Indianapolis, Indiana 46204-2251
- 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 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, 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, 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.

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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.

B.12 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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 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.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 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ 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 local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 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 commissioner or the U.S. EPA.

Compliance Monitoring Requirements

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

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

C.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 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and

expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

C.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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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 2-6.1-5] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do 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

FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) Heidelberg non-heatset lithographic sheet-fed printing press, identified as P1, constructed in 1993, with a maximum line speed of 443.33 feet per minute, and maximum printing width of 40 inches.
- (b) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P2, constructed in 1994, with a maximum line speed of 358.33 feet per minute, and maximum printing width of 28 inches.
- (c) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P3, constructed in 2000, with a maximum line speed of 583.33 feet per minute, and maximum printing width of 40 inches.
- (d) One (1) Heidelberg Quickmaster non-heatset lithographic sheet-fed printing press, identified as P7, constructed in 2001, with a maximum line speed of 124.58 feet per minute, and maximum printing width of 18 inches.

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

Emission Limitations and Standards

There are no State or Federal requirements included in this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Metropolitan Printing Services
Address:	720 South Morton Street
City:	Bloomington, Indiana 47403
Phone #:	(812) 332-7279
MSOP #:	105-20382-00036

I hereby certify that Metropolitan Printing Services is still in operation.
 no longer in operation.

I hereby certify that Metropolitan Printing Services is in compliance with the requirements of MSOP 105-20382-00036.
 not in compliance with the requirements of MSOP 105-20382-00036.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
For a Minor Source Operating Permit Renewal**

Source Background and Description

Source Name:	Metropolitan Printing Services
Source Location:	720 South Morton Street, Bloomington, Indiana 47403
County:	Monroe
SIC Code:	2752
Operation Permit No.:	MSOP105-11576-00036
Operation Permit Issuance Date:	February 16, 2000
Permit or Renewal No.:	MSOP105-20382-00036
Permit Reviewer:	ERG/ST

On September 24, 2005, the Office of Air Quality (OAQ) had a notice published in the The Herald Times, Bloomington, Indiana, stating that Metropolitan Printing Services had applied for a Minor Source Operating Permit Renewal relating to the construction and operation of a stationary commercial printing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. IDEM's mailing address was corrected throughout the permit:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6045~~
Indianapolis, Indiana 46204-**2511**

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.7 Preventive Maintenance Plan.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

...

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Metropolitan Printing Services
Source Location:	720 South Morton Street, Bloomington, Indiana 47403
County:	Monroe
SIC Code:	2752
Operation Permit No.:	MSOP105-11576-00036
Operation Permit Issuance Date:	February 16, 2000
Permit or Renewal No.:	MSOP105-20382-00036
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Metropolitan Printing Services relating to the construction and operation of a stationary commercial printing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Heidelberg non-heatset lithographic sheet-fed printing press, identified as P1, constructed in 1993, with a maximum line speed of 443.33 feet per minute, and maximum printing width of 40 inches.
- (b) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P2, constructed in 1994, with a maximum line speed of 358.33 feet per minute, and maximum printing width of 28 inches.
- (c) One (1) Komori non-heatset lithographic sheet-fed printing press, identified as P3, constructed in 2000, with a maximum line speed of 583.33 feet per minute, and maximum printing width of 40 inches.
- (d) One (1) Heidelberg Quickmaster non-heatset lithographic sheet-fed printing press, identified as P7, constructed in 2001, with a maximum line speed of 124.58 feet per minute, and maximum printing width of 18 inches.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been operating under Minor Source Operating Permit 105-11576-00036, issued on February 16, 2000.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

IDEM is aware that, pursuant to 326 IAC 2-6.1-6(d)(13), the Permittee installed the Heidelberg Quickmaster press (P7) in 2001 to replace an existing press (P5) of identical capacity. This modification did not require prior approval by IDEM because the potential to emit PM, PM10, VOC and HAP from this press are less than the exemption levels specified in 326 IAC 2-1.1-3. However, pursuant to 326 IAC 2-6.1-6(e), the Permittee was required to submit a notification to IDEM regarding this modification within thirty (30) calendar days of the modification. The Permittee has not submitted the necessary notification within the allotted time period. IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the operation permit renewal 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.

A complete application for the purposes of this review was received on November 16, 2004.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 3).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	1.5
PM10	1.5
SO ₂	0
VOC	50.5
CO	0
NO _x	0

HAPs	Potential to Emit (tons/yr)
Xylene	8.6
Toluene	3.4
Glycol Ethers	2.1
Methanol	2.0
All others	0.2
Total	16.5

- (a) The potential to emit of PM10, NO_x, SO₂, VOC and CO are all less than 100 tons per year and the potential to emit VOC 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.
- (b) The potential to emit (as defined in 326 IAC 2-7.1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7.1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

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

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM10	Attainment
PM2.5	Unclassifiable or Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Monroe County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) emissions 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 ozone. Monroe County has been designated as attainment or unclassifiable for the 1-hour and 8-hour ozone standards. Therefore, VOC and NOx 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) Monroe County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity):

Pollutant	Emissions (tons/year)
PM	1.5
PM10	1.5
SO ₂	0
VOC	50.5
CO	0
NO _x	0
Single HAP	8.6
Combination HAPs	16.5

- (a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

- (b) These emissions are based on the MSOP application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 105-20382-00036, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source and information provided in the permit renewal application submitted on November 16, 2004.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12, 40 CFR 60, Subpart QQ) are not included in this permit because printing presses (P1, P2, P3, P7) are lithographic sheet-fed presses and not publication rotogravure printing presses.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (326 IAC 20-18, 40 CFR 63, Subpart KK) are not included in the permit for the printing presses (P1, P2, P3, P7) because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

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

The source was originally constructed in 1967. This source is located in Monroe County. The source was modified in 1993, 1994, 2000, and 2001. However, this modification did not trigger PSD review because the increase in emissions of criteria pollutants never exceeded 250 tons per year and the PTE for all criteria pollutants for the entire source remain less than 250 tons per year. The potential to emit of the entire source for PM, PM10, VOC, NO_x, SO₂, and CO is less than 250 tons per year. The source is a minor source under PSD.

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

This source has not constructed or reconstructed a major source of hazardous air pollutants (HAPs) after July 27, 1997. The emission units identified as P3 and P7, constructed in 2000 and 2001, respectively, each have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to these emission units. Any changes to these emission units (P3 and P7) that would increase their potential to emit of a single HAP to equal to or greater than ten (10) tons per year or a combination of HAPs to equal to or greater than 25 tons per year shall require prior approval from IDEM.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (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 the 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.

State Rule Applicability – Printing Presses (P1, P2, P3, P7)

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

The particulate emissions from the off-set powder applied during the operation of the printing presses (P1, P2, P3, P7) are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these printing presses are not subject to the requirements of 326 IAC 6-3.

326 IAC 8-1-6 (Volatile Organic Compounds (VOC): General Reduction Requirements)

The printing presses were constructed after January 1, 1980, but the potential to emit of each of these presses is less than twenty-five (25) tons of VOC per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply. Any changes that would increase the potential VOC emissions to greater than 25 tons per year for printing presses P1, P2, P3 and P7 would require prior approval from IDEM.

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

The printing presses apply coatings to paper, but these operations are not web coating or saturation processes. Therefore, the requirements of 326 IAC 8-2-5 do not apply.

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

The printing presses apply coatings to paper, but the operations performed at these presses are not packaging rotogravure, publication rotogravure or flexographic printing. Therefore, the requirements of 326 IAC 8-5-5 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source's potential to emit of VOC is less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 do not apply.

Conclusion

The operation of this stationary commercial printing press shall be subject to the conditions of the Minor Source Operating Permit Renewal 105-20382-00036.

**Appendix A: Emissions Calculations
VOC Emissions from Printing Operations**

Company Name: Metropolitan Printing Services
Address: 720 South Morton Street, Bloomington, Indiana 47403
Permit Number: M105-20382-00036
Reviewer: ERG/ST
Date: July 19, 2005

Printing Press Throughput					PTE of VOC (tons/year)
Emission Unit	Description	Maximum Line Speed (feet/min)	Maximum Print Width (in)	Throughput (MM in ² /year)	
P1	Heidelberg	443.33	40	111,847	16.8
P2	Komori 1	358.33	28	63,282	9.50
P3	Komori 2	583.33	40	147,167	22.1
P7	Heidelberg QuickMaster	124.58	18	14,144	2.12
Totals				336,439	50.5

Ink, Varnish, Coating, Fountain, Wash and Solvent VOCs					
Material	Description	Coverage (lbs/MM in ²)	Weight % VOC	Flash Off %	PTE of VOC (lbs/MM in ²)
Ink	Flint Arrowstar Yellow	0.45	32.4%	5%	7.30E-03
Varnish	Hostmann Steinberg Matte	0.0129	24.7%	100%	3.19E-03
Coating	INK Aqueous 1206	0.814	1.56%	100%	1.27E-02
Fountain	Prisco 2451	0.0439	24.1%	100%	1.06E-02
Blanket Wash	Autowash 6000	0.0439	99.7%	100%	4.38E-02
Blanket Wash	B-4599	0.0944	100%	100%	9.44E-02
Solvent	Allied Solvent 100	0.1282	100%	100%	1.28E-01
Total					0.30

Materials shown in the table represent worst case materials for the four printing presses.

METHODOLOGY

Press Throughput (MM in²/year) = Line Speed (ft/min) x 12 (in/ft) x Maximum Print Width (in) x 60 (min/hr) x 8760 (hrs/year) x 1/1,000,000

PTE of VOC (lbs/MM in²) = Coverage (lbs/MM in²) x Weight % VOC x Flash Off %

PTE of VOC (tons/year) = Throughput (MM in²/year) x SUM (PTE of VOC for ink, varnish, coating, fountain, wash and solvent) (lbs/MM in²)

**Appendix A: Emission Calculations
HAP Emissions From Printing Operations**

TSD Append

Company Name: Metropolitan Printing Services
Address: 720 South Morton Street, Bloomington, Indiana 47403
Permit Number: M105-20382-00036
Reviewer: ERG/ST
Date: July 19, 2005

Printing Press Throughput (MM in²/year)			
Heidelberg	Komori 1	Komori 2	Heidelberg QuickMaster
111,847	63,282	147,167	14,144

Ink, Fountain, Wash and Solvent HAP Content (Weight %)								
Material	Coverage (lbs/MM in²)	Weight % Xylene	Weight % Glycol Ethers	Weight % Toluene	Weight % Methanol	Weight % Ethylene Glycol	Weight % Hydro-quinone	Flash Off %
Worst Case Ink	0.45	0.00%	0.15%	0.00%	0.00%	0.00%	0.40%	5.00%
Fountain (P1)	0.0439	0.00%	15.0%	0.00%	0.00%	0.00%	0.00%	100%
Fountain (P2, P7)	0.0451	0.00%	20.0%	0.00%	0.00%	10.0%	0.00%	100%
Fountain (P3)	0.0451	0.00%	10.0%	0.00%	0.00%	0.00%	0.00%	100%
Blanket Wash (P1 - P3)	0.0383	0.00%	0.00%	50.0%	30.0%	0.00%	0.00%	100%
Blanket Wash (P7)	0.0944	0.00%	0.00%	50.0%	30.0%	0.00%	0.00%	100%
Worst Case Solvent	0.1282	40.0%	5.00%	0.00%	0.00%	0.00%	0.00%	100%

Potential to Emit of HAPs From Presses (tons/year)							
Material	Presses	PTE of Xylene	PTE of Glycol Ethers	PTE of Toluene	PTE of Methanol	PTE of Ethylene Glycol	PTE of Hydro-quinone
Worst Case Ink	P1, P2, P3, P7	0.00	0.01	0.00	0.00	0.00	0.02
Fountain	P1	0.00	0.37	0.00	0.00	0.00	0.00
Fountain	P2, P7	0.00	0.35	0.00	0.00	0.17	0.00
Fountain	P3	0.00	0.33	0.00	0.00	0.00	0.00
Blanket Wash	P1, P2, P3	0.00	0.00	3.09	1.85	0.00	0.00
Blanket Wash	P7	0.00	0.00	0.33	0.20	0.00	0.00
Worst Case Solvent	P1, P2, P3, P7	8.63	1.08	0.00	0.00	0.00	0.00
	Totals	8.63	2.13	3.42	2.05	0.17	0.02

The varnish and coating contain no HAPs. Different fountain and wash solutions are used on each of the four presses, as indicated.

METHODOLOGY

PTE of HAPs (tons/year) = Coverage (lbs/MM in²) x Weight % HAP x Flash Off % x Throughput (MM in²/year) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations
Particulate Emissions From Printing Operations**

TSD Appendi

Company Name: Metropolitan Printing Services
Address: 720 South Morton Street, Bloomington, Indiana 47403
Permit Number: M105-20382-00036
Reviewer: ERG/ST
Date: July 19, 2005

Emission Unit	Description	Throughput (MM in²/year)	Maximum Coverage (lbs/MM in²)	PTE of PM/PM10 (tons/year)
P1	Heidelberg	111,847	0.0089	0.50
P2	Komori 1	63,282	0.0089	0.28
P3	Komori 2	147,167	0.0089	0.65
P7	Heidelberg QuickMaster	14,144	0.0089	0.06

Methodology

PTE of PM/PM10 (tons/year) = Throughput (MM in²/year) x Maximum Coverage (lbs/MM in²) x 1/2000 (ton/lbs)

PTE of PM/PM10 (lbs/hr) = PTE of PM/PM10 (tons/year) x 2000 (lbs/ton) x 1/8760 (year/hours)

326 IAC 6-3-2

Pursuant to 326 IAC 6-3-2(e)(2), the maximum allowable particulate emissions from emission units P1, P2, P3, and P7 is 0.551 pound

Emission Unit ID	PTE of PM/PM10 (lbs/hr)
P1	0.114
P2	0.064
P3	0.150
P4	0.014

ds per hour.