INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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: February 25, 2005

RE: Moore Wallace North America, Inc.-Angola Plant / 151-20451-00034

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 1/10/05

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February 25, 2005

Mr. Brian A. Hamrick
Moore Wallace North America, Inc. – Angola Plant
611 West Mill Street
Angola, Indiana 46703

Re: 151-20451-00034
First Minor Permit Revision to
FESOP 151-18281-00034

Dear Mr. Hamrick:

Moore Wallace North America, Inc – Angola Plant was issued a Federally Enforceable State Operation Permit (FESOP) on April 30, 2004 for a stationary flexographic printing operation. A letter requesting changes to this permit was received on January 19, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1 a permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the addition of one (1) Linerless Flexographic Printing Press. The addition of this new printing press will increase the VOC potential emissions by less than twenty-five (25) tons per year. However, the source-wide VOC emissions limit will not be increased by the additional printing press and will remain the same as in the current FESOP. Therefore, the modification is determined to be a minor permit revision pursuant to 326 IAC 2-8-11.1 (d) (4) (D).

Pursuant to 326 IAC 2-8-11.1(e), this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Femi Ogunsola/EVP, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call at (973) 575-2555, extension 3241 or dial (800) 451-6027, ask for extension (3-6878) or dial directly: (317) 233-6878.

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Sincerely,

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

Attachments
(FO/EVP)
cc: File – Steuben County
U.S. EPA, Region V
Steuben County Health Department
Air Compliance Section Inspector –Doyle Houser
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Moore Wallace North America, Inc – Angola Plant
611 West Mill Street,
Angola, Indiana 46703

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F151-18281-00034	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 30, 2004 Expiration Date: April 30, 2009
First Minor Permit Revision No.: 151-20451-00034	Pages affected: 4, 5, 6, 15, 23, 24, 32 and 33
Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 25, 2005

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary pressure sensitive and bar-coded products manufacturing plant using lithographic and flexographic printing to produce business forms and labels.

Authorized individual:	Plant Manager
Source Address:	611 West Mill Street, Angola, IN 46703
Mailing Address:	611 West Mill Street, Angola, IN 46703
General Source Phone:	(260) 665-9421
SIC Code:	2672, 2759, 2752
Source Location Status:	Steuben Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) lithographic printing press, identified as Press # 49, constructed in 1986, with a maximum line speed of fifteen hundred (1500) feet per minute and a printing width of thirty-two (32) inches;

(b) One (1) lithographic printing press, identified as Press # 50, constructed in 1985, with a maximum line speed of fifteen hundred (1500) feet per minute and a printing width of thirty-two (32) inches, exhausting to stacks # 3 and #4;

(c) One (1) lithographic printing press, identified as Press # 51, constructed in 2004, with a maximum line speed of fifteen hundred (1500) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 2;

(d) One (1) lithographic printing press, identified as Press # 71, constructed in 2000, with a maximum line speed of twelve hundred (1200) feet per minute and a printing width of twenty (20) inches, exhausting to stack # 5;

(e) One (1) flexographic printing press, identified as Press # 4, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 73 and # 74;

(f) One (1) flexographic printing press, identified as Press # 9, constructed in 1991, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 23;

(g) One (1) flexographic printing press, identified as Press # 10, constructed in 1994, with a maximum line speed of five hundred (500) feet per minute and a printing width of ten (10) inches, exhausting to stack # 22;

(h) One (1) flexographic printing press, identified as Press # 11, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 23;

(i) One (1) flexographic printing press, identified as Press # 34, constructed in 1996, with a maximum line speed of five hundred (500) feet per minute and a printing width of ten (10) inches, exhausting to stack # 31;

(j) One (1) flexographic printing press, identified as Press # 35, constructed in 1996, with a maximum line speed of five hundred (500) feet per minute and a printing width of ten (10) inches, exhausting to stack # 21;

(k) One (1) flexographic printing press, identified as Press # 48, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 21;

(l) One (1) flexographic printing press, identified as Press # 52, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 21;

(m) One (1) flexographic printing press, identified as Press # 53, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 16 and # 21;

(n) One (1) flexographic printing press, identified as Press # 58, constructed in 1988, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 22;

(o) One (1) flexographic printing press, identified as Press # 62, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 12 and # 16;

(p) One (1) flexographic printing press, identified as Press # 63, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 22;

(q) One (1) flexographic printing press, identified as Press # 66, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 75, # 76 and # 77;

(r) One (1) flexographic printing press, identified as Press # 67, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 8, # 9 and # 10;

(s) One (1) coater, identified as C1, constructed in 1994, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 59;

(t) One (1) coater, identified as C2, constructed in 2000, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 60; and

(u) One (1) coater, identified as C3, constructed in 2004, with a maximum line speed of six hundred and fifty (650) feet per minute and a printing width of thirty (30) inches, exhausting to stacks # 69 and # 70.

(v) One (1) Linerless Flexographic Printing Press, identified as Press # 68, constructed in 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks , identified as 78, 79 and 80.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Activities emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:

(a) Three (3) tamaracks;
(b) Plate wash unit;
(c) Six (6) collators; and
(d) Two (2) parts cleaners, installed in 1982 and 1991.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units in Sections A.2.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

(n) One (1) flexographic printing press, identified as Press # 58, constructed in 1988, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) I nches, exhausting to stack # 22;

(o) One (1) flexographic printing press, identified as Press # 62, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 12 and # 16;

(p) One (1) flexographic printing press, identified as Press # 63, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 22;

(q) One (1) flexographic printing press, identified as Press # 66, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 75, # 76 and # 77;

(r) One (1) flexographic printing press, identified as Press # 67, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 8, # 9 and # 10;

(s) One (1) coater, identified as C1, constructed in 1994, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 59;

(t) One (1) coater, identified as C2, constructed in 2000, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 60; and

(u) One (1) coater, identified as C3, constructed in 2004, with a maximum line speed of six hundred and fifty (650) feet per minute and a printing width of thirty (30) inches, exhausting to stacks # 69 and # 70.

(v) One (1) Linerless Flexographic Printing Press, identified as Press # 68, constructed in 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks , identified as 78, 79 and 80.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the use of VOC, including inks, coatings, adhesives, release agents, additives, reducers and solvents shall be less than 67.12 tons per 12 consecutive month period for the lithographic printing, flexographic printing and coating operations combined, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 67.12 tons per 12 consecutive month period from lithographic printing, flexographic printing and the coating operations.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit of a single HAP and the combination of all HAPs greater than 10 and 25 tons per year from Lithographic Presses #51 and #71, Flexographic Presses #4, #11, #66, #67, and #68 and Coaters C2 and C3 shall obtain prior approval from IDEM, OAQ.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements [326 IAC 12] [40 CFR 60.445(a)(h)]

(a) Pursuant to 60.445(a), the Permittee shall maintain a calendar month record of all coatings used and the manufacturer's formulation data used for determining the VOC content of those coatings.

Pursuant to 60.445(h), these records shall be retained for at least two years following the date of the measurements and made available upon request of the Office of Air Quality.

(b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of the single and combined HAP usage.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Moore Wallace North America, Inc.
Source Address: 611 West Mill Street, Angola, Indiana 46703
Mailing Address: 611 West Mill Street, Angola, Indiana 46703
FESOP No.: F151-18281-00034

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**Moore Wallace North America, Inc. – Angola Plant**
Source Location:	**611 West Mill Street, Angola, Indiana 46703**
County:	**Steuben**
SIC Code:	**2759**
Operation Permit No.:	**F151-18281-00034**
Operation Permit Issuance Date:	**April 30, 2004**
Minor Permit Revision No.:	**MPR 151-20451-00034**
Permit Reviewer:	**Femi Ogunsola/EVP**

The Office of Air Quality (OAQ) has reviewed a revision application from Moore Wallace North America, Inc. – Angola Plant relating to the operation of flexographic printing press for the production of labels and forms.

History

On January 19, 2005, Moore Wallace North America, Inc. – Angola Plant submitted an application to the OAQ requesting to add an additional linerless flexographic printing press to their existing plant. Moore Wallace North America, Inc. – Angola Plant was issued a FESOP on April 30, 2004. The potential VOC emissions from this additional new printing press will be 19.52 tons per year. This modification is determined to be a minor permit revision pursuant to 326 IAC 2-8-11.1 (d) (4) (D). The source's current VOC emission limitation will remain the same. Therefore, the source will remain a minor source and emissions will remain under the Part 70 permit threshold. The source will remain a FESOP source.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) linerless flexographic Printing Press, identified as Press # 68, to be constructed by May 05, 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks, identified as 78, 79 and 80.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit (FESOP) on April 30, 2004. The source has not received any approvals since the issuance of the original FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision 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 application for the purposes of this review was received on January 19, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 and 2 of TSD Appendix A).

Potential to Emit Before Controls (This Revision)

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

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM_{10}	0.00
SO_2	0.00
VOC	19.52
CO	0.00
NO_X	0.00

HAP's	Potential To Emit (tons/year)
Glycol Ethers	0.07
Total	**0.07**

Justification for Modification

The FESOP is being modified through a Minor Permit Revision. Since the potential VOC emission from this linerless flexographic printing press will be less than twenty-five (25) tons per year, this modification is being performed as a Minor Permit Revision, pursuant to 326 IAC 2-8-11.1 (d) (4)(D). However, the source will continue to limit the source-wide potential VOC emissions to less than one hundred (100) tons per year as well as the source-wide potential single HAP and total combination of HAP emissions to less than ten (10) and twenty-five (25) tons per year respectively. Therefore, the source will remain a minor source and its allowable emissions will remain below the Part 70 permit thresholds.

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Steuben County has been classified as attainment or unclassifiable in Indiana for PM_{10}, NOx, SO_2, 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 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 FESOP Source (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	-
PM_{10}	-
SO_2	-
VOC	<100.0
CO	-
NO_X	-
Single Worst Case HAP	<10.0
Total Combined HAP	<25.0

(a) This existing source is not a major stationary source under 326 IAC 2-2 because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the limited potential to emit after issuance of the FESOP issued on April 30, 2004.

Potential to Emit After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the source and including this modification after issuance.

	Potential to Emit (tons/year)							
Process/Facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**	
							Single	**Total**
Insignificant Activities	0.00	0.00	0.00	32.88	0.00	0.00	0.014	0.54
Printing Presses	0.00	0.00	0.00	**67.12**	0.00	0.00	4.446	6.41
Coaters	0.00	0.00	0.00		0.00	0.00	0.496	1.35
This Revision	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.07**	**0.07**
Total Emissions	**0.00**	**0.00**	**0.00**	**<100.0**	**0.00**	**0.00**	**<10.0**	**<25.0**

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The source will limit its source-wide emission of VOC to less than 100.0 tons per year. Likewise, the single worst case HAP emission and total combinations of HAPs source-wide will be limited to less than ten (10.0) tons and twenty-five (25.0) respectively. Therefore, the source will remain a FESOP source.

Federal Rule Applicability

(a) The requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60, Subpart QQ), Standard of Performance for the Graphics Arts Industry: Publication Rotogravure Printing were not included in the for the linerless flexographic printing press added to this source with this minor permit revision and identified as Press # 68. This standard applies to each publication rotogravure printing press that commenced construction, modification or reconstruction after October 28, 1980. The linerless flexographic is not a rotogravure printing press.

(b) The requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart FFF), Standards of Performance for Flexible Vinyl and Urethane Coating and Printing were not included in the permit for the linerless flexographic printing press added to this source with this minor permit revision and identified as Press # 68. This standard applies to each publication rotogravure printing press used to print or coat flexible vinyl or urethane products, which commenced construction, modification or reconstruction after January 18, 1983. The linerless flexographic printing press is not a rotogravure printing press.

(c) The requirements of 40 CFR 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry were not included in this permit for the linerless flexographic printing press added to this source with this revision and identified as Press # 68. This standard applies to major source of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wide-web flexographic printing presses are operated. The requirements of the NESHAP were not included for the linerless flexographic printing press at this source is not subject to the NESHAP, because it is not a publication, product and packaging rotogravure printing press, or wide-web flexographic printing press, and it is not major for single HAP and combined HAPs.

(d) The the requirements of 40 CFR 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry were not included in this permit for the linerless flexographic printing press added to this source with this revision and identified as Press # 68. This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place. The requirements of the NESHAP were not included for the linerless flexographic press is not subject to this NESHAP, because it is not major for single HAP and combined HAPs and web coating in lithography is specifically exempted by § 63.3300(c).

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This FESOP source located in Steuben County does not have the potential to emit CO, VOC, NO_X, PM_{10} or SO_2 greater than one hundred (100) tons per year. This modification will not increase the source-wide potential to emit of criteria pollutants greater than 100 tons per year. Therefore, 326 IAC 2-6 (Emission Reporting) 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 this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(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 2-8-4 (FESOP)

This source is still subject to the requirements of 326 IAC 2-8-4 (FESOP) despite this revision. Pursuant to this rule, the source wide potential to emit VOC including this revision shall be limited to less than 100 tons per 12 consecutive month period. In addition, all the conditions necessary to comply with this limit as stated in the original FESOP are still applicable to this source.

Compliance with VOC usage limit for the linerless flexographic printing press together with the existing lithographic and flexographic printing presses and the coating operations shall make 326 IAC 2-7 (Part 70) not applicable.

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

The operation of the linerless flexographic will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. This modification will not increase source-wide emission of single HAP and combination of HAP to greater than than 10 tons and twenty-five (25) tons per year respectively. Therefore, 326 IAC 2-4.1 does not apply

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (Volatile Organic Compounds)

This revision at this source is not subject to this rule. This rule applies to facilities constructed after January 1980, which have potential VOC emissions of 25 tons or more per year, and are not regulated by any other provisions of 326 IAC 8. The new printing press has potential VOC emissions of less than 25 tons per year. Therefore, this rule does not apply to the revision.

326 IAC 8-2-5 (Volatile Organic Compounds (VOC))

This rule applies to the flexographic printing press (#68) for production of labels. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not discharge into the atmosphere any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper or labels coating line.

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

This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing facilities existing as of November 1, 1980, which have potential VOC emissions of greater than one hundred (100) tons per year, or new facilities after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more VOC. The linerless flexographic printing press has potential VOC emissions of less than 25 tons per year, therefore, this rule does not apply to this revision.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) apply to source commencing operation after October 7, 1974, and prior to January 1, 1980, with potential emissions of 100 tons per year or greater of VOC, and not limited by any other 326 IAC 8 rules. This rule does not apply to this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements applicable to this source as result of this revision.

Changes Proposed

The changes listed below have been made to the FESOP 151-18281-00034.

(a) Section A.1 has been amended below to change the authorized individual from Associate Manager – Environmental Health and Safety to Plant Manager.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary pressure sensitive and bar-coded products manufacturing plant using lithographic and flexographic printing to produce business forms and labels.

Authorized individual:	~~Associate Manager – Environmental Health and Safety~~ **Plant Manager**
Source Address:	611 West Mill Street, Angola, IN 46703
Mailing Address:	611 West Mill Street, Angola, IN 46703
General Source Phone:	(260) 665-9421
SIC Code:	2672, 2759, 2752
Source Location Status:	Steuben Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

(b) The description of the new Linerless flexographic printing press has been added to Section A.2 Section A.2 (v) as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c) (3)]

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

.
.
.

(v) One (1) Linerless Flexographic Printing Press, identified as Press # 68, to be constructed by May 05, 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks , identified as 78, 79 and 80.

(c) Condition B.22 has been revised to reflect that the name of the Billing Section has been changed from I/M Billing section to Billing, Licensing and Training section.

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M &~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.

(d) The description of the additional linerless flexographic printing press has been added to Condition D.1 Facility Description list as follows:

(n) One (1) flexographic printing press, identified as Press # 58, constructed in 1988, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 22;

(o) One (1) flexographic printing press, identified as Press # 62, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 12 and # 16;

(p) One (1) flexographic printing press, identified as Press # 63, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 22;

(q) One (1) flexographic printing press, identified as Press # 66, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 75, # 76 and # 77;

(r) One (1) flexographic printing press, identified as Press # 67, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 8, # 9 and # 10;

(s) One (1) coater, identified as C1, constructed in 1994, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 59;

(t) One (1) coater, identified as C2, constructed in 2000, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 60; and

(u) One (1) coater, identified as C3, constructed in 2004, with a maximum line speed of six hundred and fifty (650) feet per minute and a printing width of thirty (30) inches, exhausting to stacks # 69 and # 70.

(v) One (1) Linerless Flexographic Printing Press, identified as Press # 68, to be constructed by May 05, 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks , identified as 78, 79 and 80.

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

(e) Condition D.1.3 has been revised to reflect the addition of a new flexographic printing press as follows:

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit of a single HAP and the combination of all HAPs greater than 10 and 25 tons per year from Lithographic Presses #51 and #71, Flexographic Presses #4, #11, #66**,** ~~and~~ #67, **and #68,** and Coaters C2 and C3 shall obtain prior approval from IDEM, OAQ.

(f) Following an update to Condition B.14 (Deviations from Permit Requirements and Conditions), the Quarterly Deviation and Compliance Monitoring Report Form has been revised to clarify on the report form that the deviations that are not required to be reported on that form are those that are deviations required to be reported pursuant to an applicable requirement that exists independent of the permit. Therefore, the FESOP Quarterly Deviation and Compliance Monitoring Report form has been revised as follows (see next page):

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Moore Wallace North America, Inc.
Source Address: 611 West Mill Street, Angola, Indiana 46703
Mailing Address: 611 West Mill Street, Angola, Indiana 46703
FESOP No.: F151-18281-00034

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Conclusion

The operation of this stationary manufacturer of labels and forms shall be subject to the conditions of the attached proposed Minor Permit Revision **No. 151-20451-00034.**

Appendix A: Emissions Calculations
VOC From Printing Press Operations
Flexographic Presses

Company Name: **Moore Wallace North America, Inc. - Angola Plant**
Address City IN Zip: **611 West Mill Street, Angola, IN 46703**
FESOP: **MPR 151-20451-00034**
Reviewer: **Femi Ogunsola/EVP**
Date: **February 4, 2005**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR	PTE VOC (TPY)
Press #68	750	20	94608	19.51
		Total Flexo:	94608	19.51

INK VOCS

Ink Name Press Id	Emission Factor (lbs VOC/MMin^2)	Maximum % Operation Time	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Inks	0.128	75.00%	70956	4.54
Coatings	0.092	75.00%	70956	3.26
Additives	0.125	75.00%	70956	4.43
Reducers	0.013	75.00%	70956	0.46
Solvents	0.192	75.00%	70956	6.81

Total VOC Emissions: **19.51 Ton/yr**

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Emission Factor pounds VOC per MMin^2 * 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%.
Emission Factor (lbs VOC/MMin^2) = Maximum Coverage pounds per MMin^2 * Weight % volatiles * Flash off %

Appendix A: Emissions Calculations
HAPs From Printing Press Operations
Flexographic Presses

Company Name: **Moore Pressure Sensitive Systems**
Address City IN Zip: **611 West Mill Street, Angola, IN 46703**
FESOP: **151-18281-00034**
Reviewer: **Femi Ogunsola/EVP**
Date: **February 4, 2005**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR	PTE HAP (TPY)
Press #68	750	20	94608	0.07

INK HAPs

Ink Name Press Id	Emission Factor (lbs HAP/MMin^2)	Maximum % Operation Time	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Inks	0.002	75.00%	70956	0.07
Coatings	0.00	75.00%	70956	0.00
Additives	0.00	75.00%	70956	0.00
Reducers	0.00	75.00%	70956	0.00
Solvents	0.00	75.00%	70956	0.00

Total HAP Emissions =	**0.07**	**Ton/yr**

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
HAPs = Emission Factor pounds HAPs per MMin^2 * 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%.
Emission Factor (lbs HAP/MMin^2) = Maximum Coverage pounds per MMin^2 * Weight % volatiles * Flash off %