



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: October 7, 2005
RE: Sunrise Publications, Inc. / 105-21342-00004
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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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY and NEW SOURCE REVIEW

**Sunrise Publications, Inc.
1145 Sunrise Greetings Court
Bloomington, Indiana 47404**

(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.

Operation Permit No.: F105-21342-00004	
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 7, 2005 Expiration Date: October 7, 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 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 commercial printing and binding plant manufacturing greeting cards and books.

Authorized individual:	CEO
Source Address:	1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address:	1145 Sunrise Greetings Court, Bloomington, Indiana 47404
General Source Phone:	(812) 336-9900
SIC Code:	2771
County Location:	Monroe
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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) offset lithographic printing press (identified as SORD) with a maximum line speed of 70 feet per minute and a maximum printing width of 36 inches. This unit was installed in 1982.
- (b) One (1) infrared dryer offset lithographic printing press (identified as Komori M) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-M. This unit was installed in 1991.
- (c) One (1) infrared dryer offset lithographic printing press (identified as Komori A) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-A. This unit was installed in 1994.
- (d) One (1) infrared dryer offset lithographic printing press (identified as Komori C) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-C. This unit was installed in 1999.
- (e) One (1) non-heatset lithographic printing press (identified as Heidelberg GTO) with a maximum line speed of 325 feet per minute and a maximum printing width of 18 inches. This unit was installed in 2003.
- (f) One (1) Binding process using vinyl acetate sheets, with Super X solvent at a maximum usage rate of 4.62 pounds per hour. This unit, also known as vinyl acetate lid making process, was installed in 1998.

Note: These units were permitted under the provisions of 326 IAC 2-6.1 (MSOP).

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):

- (a) Twenty-five (25) natural gas fired space heaters, with a combined heat input capacity of four (4.0) MMBtu per hour.
- (b) One (1) infrared dryer offset lithographic printing press (identified as 102 Z) with a maximum line speed of 390 feet per minute and a maximum printing width of 40 inches. This unit was installed in 2000.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][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, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each 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.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the 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 not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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 FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (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
Indianapolis, Indiana 46204

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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][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

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

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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, 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.10 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 [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) offset lithographic printing press (identified as SORD) with a maximum line speed of 70 feet per minute and a maximum printing width of 36 inches. This unit was installed in 1982.
- (b) One (1) infrared dryer offset lithographic printing press (identified as Komori M) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-M. This unit was installed in 1991.
- (c) One (1) infrared dryer offset lithographic printing press (identified as Komori A) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-A. This unit was installed in 1994.
- (d) One (1) infrared dryer offset lithographic printing press (identified as Komori C) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-C. This unit was installed in 1999.
- (e) One (1) non-heatset lithographic printing press (identified as Heidelberg GTO) with a maximum line speed of 325 feet per minute and a maximum printing width of 18 inches. This unit was installed in 2003.
- (f) One (1) Binding process using vinyl acetate sheets, with Super X solvent at a maximum usage rate of 4.62 pounds per hour. This unit, also known as vinyl acetate lid making process, was installed in 1998.

Insignificant Activities

- (b) One (1) infrared dryer offset lithographic printing press (identified as 102 Z) with a maximum line speed of 390 feet per minute and a maximum printing width of 40 inches. This unit was installed in 2000.

(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 Volatile Organic Compounds (VOCs) and HAPs [326 IAC 2-8]

- (a) Pursuant to 326 IAC 2-8, the total amount of VOC delivered to the six (6) lithographic printing presses plus the amount of VOC used in clean-up solvents and binding process shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Pursuant to 326 IAC 2-8, the total amount of any single HAP delivered to the six (6) lithographic printing presses plus the amount of any single HAP used in clean-up solvents, binding process and non-press operations shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Pursuant to 326 IAC 2-8, the total amount of combined HAPs delivered to the six (6) lithographic printing presses plus the amount of combined HAPs used in clean-up solvents and the binding process shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of VOC delivered to each of the three (3) lithographic printing presses, identified as Komori A, C, and M shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with these limits renders the requirement of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.3 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.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the HAP and VOC usage limitations contained in Conditions D.1.1 and Condition 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.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) and (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits established in Conditions D.1.1 and D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water 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; and
 - (4) The total VOC usage for each day (or month).
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Sunrise Publications, Inc.
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
FESOP No.: F105-21342-00004

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Sunrise Publications, Inc.
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
FESOP No.: F105-21342-00004

This form consists of 2 pages

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- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
FESOP No.: F105-21342-00004
Facility: Six (6) lithographic printing presses, clean up solvent, binding process
Parameter: Single HAP Usage
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
 Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 FESOP No.: F105-21342-00004
 Facility: Six (6) lithographic printing presses, clean up solvent, binding process
 Parameter: Total HAP Usage
 Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
 Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 FESOP No.: F105-21342-00004
 Facility: Six (6) lithographic printing presses, clean up solvents, binding process,
 Parameter: VOC Usage
 Limit: Less than ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
 Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 FESOP No.: F105-21342-00004
 Facility: Komori A
 Parameter: VOC Usage
 Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
FESOP No.: F105-21342-00004
Facility: Komori C
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sunrise Publications, Inc.
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
FESOP No.: F105-21342-00004
Facility: Komori M
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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: Sunrise Publications, Inc.
 Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
 FESOP No.: F105-21342-00004

Months: _____ to _____ Year: _____

Page 1 of 2

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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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 Federally Enforceable State Operating Permit (FESOP) and New Source Review

Source Background and Description

Source Name: Sunrise Publications, Inc.
Source Location: 1145 Sunrise Greetings Court, Bloomington Indiana 47404
County: Monroe
SIC Code: 2771
Operation Permit No.: F105-21342-00004
Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP application from Sunrise Publications, Inc. Inc. relating to the operation of a commercial printing and binding plant manufacturing greeting cards and books.

History

On June 27, 2005, Sunrise Publications, Inc. (formerly known as Inter Art Distribution) submitted an application to IDEM, OAQ requesting permission to continue to operate their existing commercial printing plant used for printing greeting cards and books under the provisions of 326 IAC 2-6.1 (MSOP) or 326 IAC 2-9 (Source Specific Operating Agreement).

Sunrise Publications, Inc. purchased this commercial printing plant from Graphic Impressions, Inc., in 1996 and was issued a Minor Source Operating Permit No. 105-12296-00004, on October 2, 2000, and a Notice Only Change No. 105-18295-00004 on November 23, 2003.

Upon review of the past permit applications, the Permittee determined that the maximum coverage capacity of the inks and the throughput of coatings were underestimated. Using the revised capacities and throughput rates, the potential to emit of VOC increased from 62.2 tons per year (from the Technical Support Document for MSOP No. 105-12296-00004) to 160 tons per year and the potential to emit a single HAP was calculated to be greater than 10 tons per year. The potential to emit of combination of HAPs is less than 25 tons per year.

In addition, the Permittee has undertaken the following recent modifications: (1) change in the raw material usage for the printing presses; and (2) equipment modification to SORD press such that it is capable of coating sheets of paper and is no longer used for printing with ink. On July 22, 2005, the Permittee indicated that on August 1, 2005 it will permanently remove two (2) lithographic printing presses (AFT Chief 25 UV and South Building Press).

The source-wide actual VOC emissions based on the actual usage data for the year 1999, 2000, 2001, 2002, 2003 and 2004 were equal to 22.2, 11.8, 12.4, 10.5, 13.8, and 16 tons per year, respectively, while the source-wide actual HAP emissions based on the actual usage data for the year 1997 through 2005 have never been above major threshold levels.

Based on discussions with the Permittee on July 7, 2005 via telephone, the Permittee has now requested to operate their existing source under the provisions of 326 IAC 2-8 (FESOP).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) offset lithographic printing press (identified as SORD) with a maximum line speed of 70 feet per minute and a maximum printing width of 36 inches. This unit was installed in 1982.
- (b) One (1) infrared dryer offset lithographic printing press (identified as Komori M) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-M. This unit was installed in 1991.
- (c) One (1) infrared dryer offset lithographic printing press (identified as Komori A) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-A. This unit was installed in 1994.
- (d) One (1) infrared dryer offset lithographic printing press (identified as Komori C) with a maximum line speed of 504 feet per minute and a maximum printing width of 40 inches, and exhausting at stack K-C. This unit was installed in 1999.
- (e) One (1) non-heatset lithographic printing press (identified as Heidelberg GTO) with a maximum line speed of 325 feet per minute and a maximum printing width of 18 inches. This unit was installed in 2003.
- (f) One (1) Binding process using vinyl acetate sheets, with Super X solvent at a maximum usage rate of 4.62 pounds per hour. This unit, also known as vinyl acetate lid making process, was installed in 1998.
- (g) One (1) heatset lithographic printing press (identified as AFT Chief 25 UV Press) with a maximum line speed of 200 feet per minute and a maximum printing width of 25 inches. This unit was installed in 2003 **(and will be permanently removed from the plant on August 1, 2005)**.

Note: These units were permitted under the provisions of 326 IAC 2-6.1 (MSOP).

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Twenty-five (25) natural gas fired space heaters, with a combined heat input capacity of 3.75 MMBtu per hour.
- (b) One (1) infrared dryer offset lithographic printing press (identified as 102 Z) with a maximum line speed of 390 feet per minute and a maximum printing width of 40 inches. This unit was installed in 2000.
- (c) One (1) lithographic printing press (identified as South Building Press) with a maximum line speed of 55 feet per minute and a maximum printing width of 27 inches. This unit was installed in 1994 **(and will be permanently removed from the plant on August 1, 2005)**.

Existing Approvals

The source has been operating under the following permits:

- (a) MSOP 105-12296-00004, issued on October 2, 2000; and
- (b) Notice Only Change No.: 105-18295-00004, issued on November 25, 2003.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issues

IDEM is aware that equipment was modified between 2000 and 2005 and the source operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. Upon review of the past permit applications the Permittee determined that the maximum coverage capacity of the inks and the throughput of coatings were underestimated. Using the revised capacities and throughput rates, the potential to emit of VOC increased from 62.2 tons per year (from the Technical Support Document to MSOP No. 105-12296-00004) to greater than 100 tons per year and the potential to emit a single HAP was calculated to be greater than 10 tons per year. Therefore, this source should have been operating under the provisions of the Part 70 permit or FESOP programs.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 27, 2005. Additional information was received on July 22, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

Potential To Emit of Entire Source

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	0.12
PM10	0.12
SO ₂	0.01
VOC	160
CO	1.38
NO _x	1.64

HAPs	Potential to Emit (tons/year)
Glycol Ether	38.9
Xylene	2.43
Cumene	0.003
Ethylbenzene	0.49
1,2,4 – Trimethylbenzene	0.11
Benzene	2.10E-04
Dichlorobenzene	1.20E-04
Formaldehyde	7.49E-03
Hexane	1.80E-01
Toluene	3.40E-04
Total	42.0

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the total combined HAP are greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its HAP emissions below the Title V levels.
- (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 and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source’s potential to emit is based on the emission units included in the original FESOP.

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	NOx	CO	HAPs
*Komori A	0.0	0.0	0.0	Less than 99 tons per twelve (12) consecutive month period with compliance determined at the end of each month	0.0	0.0	Less than 9.8 and 24.9 tons per year for any single and combination of HAPs.
*Komori C	0.0	0.0	0.0		0.0	0.0	
*Komori M	0.0	0.0	0.0		0.0	0.0	
Press – SORD	0.0	0.0	0.0		0.0	0.0	
Press – 102 Z (Insignificant)	0.0	0.0	0.0		0.0	0.0	
Press – Heidelberg	0.0	0.0	0.0		0.0	0.0	
Binding Process (Vinyl Acetate Lid Making Process)	0.0	0.0	0.0		0.0	0.0	
25 Space Heaters (Insignificant)	0.12	0.12	0.01	1.38	1.64	1.38	0.03
Total Emissions from the Entire Source	0.76	0.76	0.06	Less than 100 tons/year	9.99	8.38	Less than 10 and 25 tons per year for any single and combination of HAPs.

*Komori A, C, and M are also limited to less than 25 tons of VOC per 12 consecutive month period with compliance determined at the end of each month pursuant to 326 IAC 8-1-6.

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM10	Attainment
PM2.5	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 PM2.5 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 entire source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Monroe County has been designated as attainment or unclassifiable for ozone. 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 entire 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) and 326 IAC 2-2. See the State Rule Applicability for the entire source section.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.76
PM10	0.76
SO ₂	0.06
VOC	<100
CO	8.39
NO _x	9.99
Single HAP	<10
Combination HAPs	<25

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

- (b) These emissions were based on the potential to emit for the source as shown in Appendix A, page 8 of 8.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12) because this NSPS applies only to rotogravure printing presses. Sunrise Publication uses only lithographic printing presses at this plant.

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

- (b) This source is not subject to the requirements of 40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (NESHAP)(326 IAC 20) because this source does not operate rotogravure or wide-web flexographic printing presses.
- (c) This source is not subject to the requirements of 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating (NESHAP) (326 IAC 20) because this source has opted to operate this plant under the provisions of 326 IAC 2-8 (FESOP) with the potential to emit of single and combination of HAPs limited to less than 10 and 25 tons per year, respectively. Note that the compliance date for 40 CFR 63, Subpart JJJJ is December 4, 2005.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, or 40 CFR Part 63) included in this permit.

State Rule Applicability – Entire Source

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

Sunrise Publications, Inc. (formerly known as Inter Art Distribution) purchased this commercial printing plant from Graphic Impressions, Inc. in 1996 and was issued a Minor Source Operating Permit No.: 105-12296-00004, on October 2, 2000 and a Notice Only Change No. 105-18295-00004 on November 23, 2003.

This source is not in one (1) of the twenty-eight (28) listed source categories. The source was modified in 2003 to add two (2) lithographic printing presses (identified as AFT Chief 25 UV and Heidelberg GTO). After this modification, the potential to emit of each criteria pollutant from the entire source were calculated to be less than 250 tons per year.

Upon review of the past permit applications, the Permittee determined that the maximum coverage capacity of the inks and the throughput rate of inks/coatings were previously underestimated. Furthermore, the Permittee identified the most recent modifications at the source as follows: (1) change in the raw material usage for the printing presses; and (2) equipment modification to SORD press such that it is capable of coating sheets of paper and is no longer used for printing with ink. On July 22, 2005, the Permittee indicated that on August 1, 2005 it will permanently remove two (2) lithographic printing presses (AFT Chief 25 UV and South Building Press).

Using the revised capacities and throughput rates, and Material Safety Data Sheets (MSDS) of the new inks/coatings, the potential to emit of VOC was estimated to be equal to 160 tons per year. The source-wide actual VOC emissions based on the actual usage data for the year 1999, 2000, 2001, 2002, 2003, and 2004 were equal to 22.2, 11.8, 12.4, 10.5, 13.8, and 16 tons per year, respectively. The PTE of the existing source was 62.2 tons per year. The Permittee has now requested to operate this plant under the provisions of 326 IAC 2-8 (FESOP).

Therefore, this source is still a minor source under PSD and is not subject to the requirements of 326 IAC 2-2. The potential to emit of all other criteria pollutants remains less than 250 tons per year.

326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

Pursuant to 326 IAC 2-8 (FESOP) and in order to limit the source to less than one hundred (100) tons per year of VOC and less than ten (10) and twenty-five (25) tons per year of any single and combination of HAPs, respectively:

- (a) The total amount of VOC delivered to the six (6) lithographic printing presses plus the amount of VOC used in clean-up solvents, binding process, and non-press operations shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total amount of any single HAP delivered to the six (6) lithographic printing presses plus the amount of any single HAP used in clean-up solvents and the binding process shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total amount of combined HAPs delivered to the six (6) lithographic printing presses plus the amount of combined HAPs used in clean-up solvents and the binding process shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

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

This source has accepted limits on the amount of hazardous air pollutants (HAPs) used at this plant such that the potential to emit a single HAP is limited less than ten (10) tons per year and the potential to emit a combination of HAPs is limited to less than twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is located in Monroe County and is not required to operate under a Title V permit. 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 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 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 because it is not located in Lake or Marion Counties [326 IAC 8-1(1)]; and it commenced operation after January 1, 1980. [326 IAC 8-6-1(2)]

State Rule Applicability – Eight (8) Lithographic Printing Presses

326 IAC 8-1-6 (New Facilities: General Reduction Requirement)

- (a) Although constructed after January 1, 1980, the lithographic printing presses (identified as

SORD, 102 Z, Chief 25, Heidelberg GTO, and South Building Press) are not subject to the provisions of 326 IAC 8-1-6 because they each have potential VOC emissions less than 25 tons per year. (Note: Printing Press Chief 25 and South Building Press were permanently removed from the plant on August 1, 2005.)

- (b) Printing press identified as Komori M was constructed in 1991 while printing presses identified as Komori A and Komori C were constructed in 1994. The potential VOC emissions from these three (3) lithographic printing presses were estimated using the data submitted on June 27, 2005, which included information on maximum capacities and throughput rates of the presses, and Material Safety Data Sheets (MSDS) of the new inks/coatings used. The revised potential VOC emissions from each press are greater than 25 tons per year. However, the source-wide actual VOC emissions based on the actual usage data for the years 1999, 2000, 2001, 2002, 2003, and 2004 were equal to 22.2, 11.8, 12.4, 10.5, 13.8, and 16 tons per year, respectively.

The Permittee has now requested a limit on the amount of VOC delivered to each of the three (3) lithographic printing presses (identified as Komori A, C, and M) to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Since IDEM, OAQ believes that these presses have not exceeded the 25 tons per year threshold, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

The source is not subject to the provisions of 326 IAC 8-2-5 (Paper Coating Operations) because the lithographic printing presses do not perform any web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels. The presses are used for printing books and greeting cards by indirect image transfer by using a metal or paper plate to ink a smooth rubber cylinder that transfers the ink to the paper.

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

This source is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operation) because it does not operate flexographic, packaging rotogravure, or publication rotogravure printing presses. It operates only lithographic printing presses.

326 IAC 6-3 (Particulate Matter Limitation for Manufacturing Processes)

The source is not subject to the provisions of 326 IAC 6-3 (Particulate Matter Limitation for Manufacturing Processes) because the operation of the lithographic printing presses do not result in particulate emissions.

State Rule Applicability – Binding Process

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

The binding process (vinyl acetate lid making process) is not subject to the provisions of 326 IAC 8-1-6 because this operation does not have potential VOC emissions greater than 25 tons per year. Any change or modification that would result in potential VOC emissions equal to or greater than 25 tons per year must receive prior approval from IDEM, OAQ.

State Rule Applicability – Natural Gas-Fired Space Heaters

326 IAC 6-2-4 (Particulate Emission Limitation for Sources of Indirect Heating)

This source is not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitation for Sources of Indirect Heating) because this rule is applicable to boilers and process heaters, whereas the source operates space heaters only.

Testing Requirements

No stack test is required in this FESOP because compliance with the VOC and HAP usage limits (major pollutants) will be demonstrated by keeping records of the amount of VOC and HAP used.

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.

Conclusion

The operation of this commercial printing and binding plant manufacturing greeting cards and books shall be subject to the conditions of the FESOP No.: 105-21342-00004.

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

**Addendum to Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)
and New Source Review**

Source Background and Description

Source Name: Sunrise Publications, Inc.
Source Location: 1145 Sunrise Greetings Court, Bloomington Indiana 47404
County: Monroe
SIC Code: 2771
Operation Permit No.: F105-21342-00004
Permit Reviewer: ERG/SD

On August 18, 2005, the Office of Air Quality (OAQ) had a notice published in The Herald Times, Bloomington, Indiana, stating that Sunrise Publications, Inc. had applied for a Federally Enforceable State Operating Permit to operate a commercial printing and binding plant manufacturing greeting cards and books. 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.

On September 9, 2005, Sunrise Publications, Inc. submitted comments on the proposed FESOP. The summary of the comments are as follows. (Deleted language appears as ~~strikeout~~, new language is **bolded**).

Comment 1:

The Permittee requested the general source phone number given in Section A.1 be changed from (812) 336-9902 to (812) 336-9900.

Response to Comment 1:

Section A.1 has been revised as shown below.

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

The Permittee owns and operates a commercial printing and binding plant manufacturing greeting cards and books.

Authorized individual: CEO
Source Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
Mailing Address: 1145 Sunrise Greetings Court, Bloomington, Indiana 47404
General Source Phone: ~~(812) 336-9902~~**9900**
SIC Code: 2771
County Location: Monroe
Source Location Status: Attainment for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not in 1 of 28 Source Categories

Comment 2:

The source operates only six (6) lithographic printing presses at this plant, as described in Section A.1 and Section D.1. However, Condition D.1.1, item (b) incorrectly cites eight (8) lithographic printing presses.

Response to Comment 2:

Condition D.1.1, item (b) has been corrected to cite six (6) lithographic printing presses instead of eight (8) as shown below:

D.1.1 Volatile Organic Compounds (VOCs) and HAPs [326 IAC 2-8]

...

- (b) Pursuant to 326 IAC 2-8, the total amount of any single HAP delivered to the ~~eight (8)~~ **six (6)** lithographic printing presses plus the amount of any single HAP used in clean-up solvents, binding process and non-press operations shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) **Pursuant to 326 IAC 2-8,** ~~the~~ total amount of combined HAPs delivered to the six (6) lithographic printing presses plus the amount of combined HAPs used in clean-up solvents and the binding process shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Comment 3:

The Permittee stated that Condition C.13, which requires the Permittee to prepare a written emergency reduction plans (ERPs) consistent with safe operating procedures, is irrelevant. The sources of emissions at this facility are printing presses, a vinyl acetate lid making machine, and natural gas-fired space heaters. Based on the type of equipment and lack of control devices, the Permittee does not anticipate any episode levels that would require them to have a plan to reduce or eliminate air pollutant emissions.

Response to Comment 3:

Condition C.13 is not applicable to the source because the Permittee is operating the source under the provisions of 326 IAC 2-8 (FESOP) which limits the potential to emit of each criteria pollutant and HAPs to less than major source threshold levels. Furthermore, this source does not have potential to emit PM equal to or greater than 100 tons per year. Therefore, Condition C.13 has been deleted from the permit as shown below and the remaining conditions in Section C have been renumbered accordingly:

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- ~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- ~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204~~

~~within ninety (90) days from the date of issuance of this permit.~~

~~The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

Comment 4:

The Permittee stated that Condition D.1.3 which requires the Permittee to maintain a Preventive Maintenance Plan (PMP), is irrelevant. A PMP lists individuals responsible for inspecting and maintaining emission control devices, as well as inspection schedules and identification of replacement parts for emission control devices. Based on the type of equipment at this plant and lack of control devices, the Permittee does not foresee the necessity of this requirement in the permit.

Response to Comment 4:

It is clear from the structure of the wording in 326 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section." No changes were made as a result of this comment.

Comment 5:

The Permittee requested the following changes to the Technical Support Document (TSD)

- (a) Page 4 of 9, Potential to Emit after Issuance table: The total emissions from the entire source as listed in the table are incorrect. The total emissions do not match the sum of emissions from the individual pieces of equipment.
- (b) Page 5 of 9, Source Status Section: The emissions listed in the table are incorrect. The emission values listed in the table do not match the sum of emissions from individual pieces of equipment listed in the table on page 4 of 9. The emission values do not match emissions listed in the table on page 3 of 9.
- (c) Page 8 of 9, State Rule Applicability for lithographic printing presses, item (b): The construction date of Komori C is listed as 1994, whereas the actual construction date for this unit is 1999.

Response to Comment 5:

- (a) In their comment, the Permittee stated that rather than using the 57 natural gas-fired space heaters with a maximum heat input capacity of 0.4 MMBtu per hour, each (as originally stated), it uses 25 natural gas-fired space heaters with a combined maximum heat input capacity of 3.75 MMBtu per hour. As a result, the total emissions from the entire source were recalculated in Appendix A of the TSD.

(b) The revised tables are as follows:

Potential to Emit After Issuance

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	NO _x	CO	HAPs
*Komori A	0.0	0.0	0.0	Less than 99 tons per twelve (12) consecutive month period with compliance determined at the end of each month	0.0	0.0	Less than 9.8 and 24.9 tons per year for any single and combination of HAPs.
*Komori C	0.0	0.0	0.0		0.0	0.0	
*Komori M	0.0	0.0	0.0		0.0	0.0	
Press – SORD	0.0	0.0	0.0		0.0	0.0	
Press – 102 Z (Insignificant)	0.0	0.0	0.0		0.0	0.0	
Press – Heidelberg	0.0	0.0	0.0		0.0	0.0	
Binding Process (Vinyl Acetate Lid Making Process)	0.0	0.0	0.0		0.0	0.0	
25 Space Heaters (Insignificant)	0.12	0.12	0.01	1.38	1.64	1.38	0.03
Total Emissions from the Entire Source	0.76 0.12	0.76 0.12	0.06	Less than 100 tons/year	9.99	8.38	Less than 10 and 25 tons per year for any single and combination of HAPs.

Source Status

Pollutant	Emissions (tons/year)
PM	0.76 0.12
PM10	0.76 0.12
SO ₂	0.06
VOC	<100
CO	8.39
NO _x	9.99
Single HAP	<10
Combination HAPs	<25

(c) The construction date for Komori C was listed incorrectly as 1994 in the discussion of the applicability of 326 IAC 8-1-6. The correct date of construction is 1999. Since both dates are after the January 1, 1980 applicability date for 326 IAC 8-1-6, this error does not alter the conclusions made in the TSD discussion for the six lithographic printers.

Although IDEM, OAQ agrees with the above requested revisions, no changes have been made to the TSD because IDEM, OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, IDEM, OAQ has decided to make the following changes to the permit:

1. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained these requirements.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~[326 IAC 6-3-2]

- (a) ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- (b) 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.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Twenty-five (25) Space Heaters**

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Heat Input Capacity
MMBtu/hour

3.8

Potential Throughput
MMCF/year

33

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.12	0.12	0.01	1.64	0.09	1.38

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factor for NO_x: (Uncontrolled) = 100 lb/MMCF.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Twenty-five (25) Space Heaters

Company Name: Sunrise Publications, Inc.

Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404

FESOP: 105-21342

Plt ID: 105-00004

Reviewer: ERG/SD

Date: August 3, 2005

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	3.45E-05	1.97E-05	1.23E-03	2.96E-02	5.58E-05

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	8.21E-06	1.81E-05	2.30E-05	6.24E-06	3.45E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998)..
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
VOC Emissions**

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Press I.D.	Press Type	Max.Line Speed (feet/min)	Max.Print Width (inches)	Max.Throughput (MMin ² /year)
Komori A	Offset	504	40.0	127,153
Komori C	Offset	504	40.0	127,153
Komori M	Offset	504	40.0	127,153

Material Usage	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	* Flash Off %	PTE of VOC (tons/year)
Komori A				
Ink	1.00	9.69%	80%	4.93
Polymer Coating	7.88	6.40%	100%	32.1
Autowash 9000	0.02	98.0%	100%	1.24
3551 Plus 2	0.01	90.0%	100%	0.69
MRC-K	0.0008	99%	100%	0.05
Komori C				
Ink	0.67	9.69%	80%	3.29
Polymer Coating	7.88	6.40%	100%	32.1
Autowash 9000	0.02	98.0%	100%	1.24
3551 Plus 2	0.01	90.0%	100%	0.46
MRC-K	0.0008	99%	100%	0.05
Komori M				
Ink	1.00	9.69%	80%	4.93
Polymer Coating	7.88	6.40%	100%	32.1
Autowash 9000	0.02	98.0%	100%	1.24
3551 Plus 2	0.01	90.0%	100%	0.69
MRC-K	0.0008	99%	100%	0.05

39.0 Total from Komori A

37.1 Total from Komori C

39.0 Total from Komori M

** According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).
the flash off for a heatset offset lithographic printing press is equal to 80 %, and for other heatset offset presses it is equal to 100%.

METHODOLOGY

Max. Throughput (MMin²/year) = Max. Line Speed (feet/minute) * 12 inches/feet * Max. Print Width (inches) * 60 minutes/ hour * 8760 hours/year

PTE of VOC (tons/year) = Max. Coverage (lbs/MMin²) * Weight % Volatiles * Flash Off % * Max. Throughput (MMin²/year) * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
HAP Emissions

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Press I.D.	Press Type	Max.Line Speed (feet/min)	Max.Print Width (inches)	Maxi.Throughput (MMin ² /year)
Komori A	Offset	504	40.0	127,153
Komori C	Offset	504	40.0	127,153
Komori M	Offset	504	40.0	127,153

Material Usage	Maxium Coverage (lbs/MMin ²)	Weight % Glycol Ether	Weight % Xylene	Weight % Cumene	Weight % 1,2,4 - Trimethylbenzene	Flash Off %	PTE Glycol Ether	PTE Xylene	PTE Cumene	PTE of 1,2,4 - Trimethylbenzene
Komori A										
Ink	1.00	0%	0%	0%	0%	80%	0.00	0.00	0.00	0.00
Polymer Coating	7.88	2.5%	0%	0%	0%	100%	12.52	0.00	0.00	0.00
Autowash 9000	0.02	10.0%	0%	0%	1.60%	100%	0.13	0.00	0.00	0.02
3551 Plus 2	0.01	30.0%	0%	0%	0%	100%	0.23	0.00	0.00	0.00
MRC-K	0.0008	10.0%	1.50%	1.20%	8.10%	100%	0.01	0.001	0.001	0.0043
Komori C										
Ink	0.67	0%	0%	0%	0%	80%	0.00	0.00	0.00	0.00
Polyer Coating	7.88	2.5%	0%	0%	0%	100%	12.52	0.00	0.00	0.00
Autowash 9000	0.02	10.0%	0%	0%	1.60%	100%	0.13	0.00	0.00	0.02
3551 Plus 2	0.01	30.0%	0%	0%	0%	100%	0.15	0.00	0.00	0.00
MRC-K	0.0008	10.0%	1.5%	1.20%	8.10%	100%	0.01	0.001	0.00	0.0043
Komori M										
Ink	1.00	0%	0%	0%	0%	80%	0.00	0.00	0.00	0.00
Polyer Coating	7.88	2.5%	0%	0%	0%	100%	12.52	0.00	0.00	0.00
Autowash 9000	0.02	10.0%	0%	0%	1.60%	100%	0.13	0.00	0.00	0.02
3551 Plus 2	0.01	30.0%	0%	0%	0%	100%	0.23	0.00	0.00	0.00
MRC-K	0.0008	10.0%	1.5%	1.20%	8.10%	100%	0.01	0.001	0.00	0.0043

Total Potential To Emit of HAPs (tons/year) = 38.6 0.002 0.002 0.07

METHODOLOGY

Max. Throughput (MMin²/year) = Max. Line Speed (feet/minute) * 12 inches/feet * Max. Print Width (inches) * 60 minutes/ hour * 8760 hours/year

PTE of HAPs (tons/year) = Max. Coverage (lbs/MMin²) * Weight % HAP * Flash Off % * Max. Throughput (MMin²/year) * 1 ton/ 2000 lbs

**Appendix A: Emissions Calculations
VOC Emissions**

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Press I.D.	Press Type	Max.Line Speed (feet/min)	Max.Print Width (inches)	Max.Throughput (MMin ² /year)
SORD	Non-heatset	70	36.0	15,894
102 Z	Offset	390	40.0	98,392
Heidelberg GTO	Non-heatset	325	18.0	36,897

Press I.D.		Max. Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
SORD					
	Ink	0.17	9.69%	5%	0.01
	Q8000 Coating	7.88	30.0%	100%	18.8
	UV #8 Press Wash	0.01	100%	100%	0.04
102 Z					
	Ink	0.34	9.69%	80%	1.28
	Autowash 9000	0.01	98.0%	100%	0.62
	3551 Plus 2	0.01	90.0%	100%	0.23
Heidelberg					
	Ink	0.84	9.69%	5%	0.07
	Autowash 9000	0.07	98.0%	100%	3.30
	3551 Plus 2	0.01	90.0%	100%	0.61

18.8 Total from SORD

2.12 Total from 102 Z

3.98 Total from Heidelberg

** According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).
the flash off for a heatset offset lithographic printing press is equal to 80 %, and for other heatset offset presses it is equal to 100%.

METHODOLOGY

Max. Throughput (MMin²/year) = Maxium line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year

PTE of VOC (tons/year) = Max. Coverage (lbs/MMin²) * Weight % Volatiles * Flash Off % * Max. Throughput (MMin²/year) * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
HAP Emissions

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Pit ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Press I.D.	Max.Line Speed (feet/min)	Max.Print Width (inches)	Max.Throughput (MMin ² /year)
SORD	70	36.0	15,894
102 Z	390	40.0	98,392
Heidelberg GTO	325	18.0	36,897

Press I.D	Max. Coverage (lbs/MMin ²)	Weight % Glycol Ether	Weight % Xylene	Weight % 1,2,4 -Trimethylbenzene	Weight % Cumene	Flash Off %	PTE Glycol Ether	PTE Xylene	PTE 1,2,4 -Trimethylbenzene	PTE Cumene
SORD										
Ink	0.17	0%	0%	0%	0%	5%	0	0.00E+00	0.00E+00	0.00E+00
Q8000 Coating	7.88	0%	0%	0%	0%	100%	0.0	0.00E+00	0.00E+00	0.00E+00
UV #8 Press Wash	0.01	60.0%	2.5%	13.5%	2.00%	100%	0.03	1.10E-03	5.91E-03	8.76E-04
102Z										
Ink	0.34	0%	0%	0%	0%	80%	0.00	0.00E+00	0.00E+00	0.00E+00
Autowash 9000	0.01	10.0%	0%	1.60%	0%	100%	0.06	0.00E+00	1.01E-02	0.00E+00
3551 Plus 2	0.01	30.0%	0%	0%	0%	100%	0.08	0.00E+00	0.00E+00	0.00E+00
Heidelberg										
Ink	0.84	0%	0%	0%	0%	5%	0	0.00E+00	0.00E+00	0.00E+00
Autowash 9000	0.07	10.0%	0%	1.60%	0%	100%	0.13	0.00E+00	2.02E-02	0.00E+00
3551 Plus 2	0.01	30.0%	0%	0%	0%	100%	0.08	0.00E+00	0.00E+00	0.00E+00

Total Potential To Emit of HAPs (tons/year) = 0.37 1.10E-03 3.62E-02 8.76E-04

METHODOLOGY

Max. Throughput (MMin²/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year

PTE of HAPs (tons/year) = Max. Coverage (lbs/MMin²) * Weight % HAP * Flash Off % * Max. Throughput (MMin²/year) * 1 ton/ 2000 lbs

**Appendix A: Emissions Calculations
VOC/HAP Emissions**

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

Operation	Max. Usage Rate (lbs/hour)	Weight % VOC	PTE of VOC (tons/year)	Weight % Xylene	PTE of Xylene (tons/year)	Weight % Ethylbenzene	PTE of Ethylbenzene (tons/year)
* Binding Process	4.62	98%	19.8	12.0%	2.43	2.40%	0.49

* Also known as Vinyl Acetata Lid Making Process

METHODOLOGY

PTE of VOC/HAP (tons/year) = Max. Usage Rate of Super Solvent X (lbs/hour) * Weight % VOC/HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC/HAP Emissions**

Company Name: Sunrise Publications, Inc.
Address: 1145 Sunrise Greetings Ct., Bloomington, Indiana 47404
FESOP: 105-21342
Plt ID: 105-00004
Reviewer: ERG/SD
Date: August 3, 2005

POTENTIAL TO EMIT (Tons/Year)

Emssion Units	PM	PM10	SO₂	NOX	VOC	CO	Combined HAPs	Installation Dates
25 Natural Gas Fired Space Heaters	0.12	0.12	0.01	1.64	0.09	1.38	0.03	
Press - Komori A	0.0	0.0	0.0	0.0	39.0	0.0	38.7	1994
Press - Komori C	0.0	0.0	0.0	0.0	37.1	0.0		1999
Press - Komori M	0.0	0.0	0.0	0.0	39.0	0.0		1991
Press - SORD	0.0	0.0	0.0	0.0	18.8	0.0	0.41	1982
Press - 102 Z	0.0	0.0	0.0	0.0	2.12	0.0		2000
Press - Heidelberg GTO	0.0	0.0	0.0	0.0	3.98	0.0		2003
Binding Process	0.0	0.0	0.0	0.0	19.8	0.0	2.91	1998
TOTAL	0.12	0.12	0.01	1.64	160	1.38	42.0	

Highest Single HAP (Gylcol Ether) in tons per year = 38.9