



TO: Interested Parties / Applicant

RE: Sport Graphics / 097-21383-00318

FROM: Felicia A. Robinson  
Manager of Environmental Planning

## 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 fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
indygov.org/dpw



# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Sport Graphics  
3423 Park Davis Circle  
Indianapolis, Indiana 46236**

(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.: F097-21383-00318	
Issued by:	Issuance Date: March 15, 2006
Originally Signed by:	Expiration Date: March 14, 2011
Felicia A. Robinson Manager of Environmental Planning Indianapolis Office of Environmental Services	



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 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)]

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The Permittee owns and operates a Stationary Printing Operation.

Authorized individual:	President/CEO
Source Address:	3423 Park Davis Circle Indianapolis, Indiana 46236
Mailing Address:	3423 Park Davis Circle Indianapolis, Indiana 46236
SIC Code:	2759
Source Location Status:	Marion County Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

- (g) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.
- (h) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.
- (i) One (1) Komori Offset Lithographic 2 Color Press, identified as EU14, installed January 15, 2002 with a maximum line speed of 427.8 feet per minute, and a maximum printing width of 28 inches, using no controls, and exhausting inside the building.

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

- (a) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) 1.25 MMBtu/ hr Web Press Gas Dryer, identified as EU 11, and venting to stack Number 1.
- (b) Paved and unpaved roads and parking lots with public access.

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), and OES to renew 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]**

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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]**

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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]**

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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]**

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

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

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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)]**

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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)]**

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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)]**

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- (a)      The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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, and OES copies of records required to be kept by this permit.
  
- (b)      For information furnished by the Permittee to IDEM, OAQ, and OES, 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 and OES 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. All 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 April 15 of each year to:

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

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

- (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, and OES 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, and OES 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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 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 46204-2251

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.
  - (g) 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.
  - (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)]**

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- (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 46204-2251

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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]**

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- (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 OES 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 OES 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 OES at least thirty (30) days in advance of the date this permit is to be reopened, except that OES 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)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES 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, IN 46204-2251

and

Indianapolis Office of Environmental Services  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

- (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, and OES on or before the date it is due.
- (2) If IDEM, OAQ, and OES 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, and OES 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, and OES, 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]**

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- (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 46204-2251

and

Indianapolis Office of Environmental Services  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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 46204-2251

and

Indianapolis Office of Environmental Services  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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, and OES, 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][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, 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 46204-2251

and

Indianapolis Office of Environmental Services  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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 2-3 (Emission Offset);
- (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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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.

(d) 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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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)]

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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]

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

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- (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 46204-2251

and

Indianapolis Office of Environmental Services  
Asbestos Section  
2700 South Belmont Avenue  
Indianapolis, IN 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.8 Performance Testing [326 IAC 3-6]**

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- (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, and OES.

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

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

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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, and OES 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, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES a

reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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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.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

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- (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, and OES 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, and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve 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.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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 Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
and  
  
Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221
- (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, and OES 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) Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (g) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.
- (h) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.
- (i) One (1) Komori Offset Lithographic 2 Color Press, identified as EU14, installed January 15, 2002, with a maximum line speed of 427.8 feet per minute, and a maximum printing width of 28 inches, using no controls, and exhausting inside the building.

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

**D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-8]**

- (a) The VOC usage in EU2 and EU10 shall each be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month such that 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) The combined VOC usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

**D.1.2 Hazardous Air Pollutants (HAP's) [326 IAC 2-8][326 IAC 2-4.1]**

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- (a) Total Individual HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply.
- (b) The total combined HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply

**Compliance Determination Requirements**

**D.1.3 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 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, and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.4 Hazardous Air Pollutants (HAPs)**

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- (a) Compliance with the HAP usage limitations contained in Conditions D.1.2 shall be determined using formulation data supplied by the coating manufacturer.
- (b) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total individual hazardous air pollutant usage and total combined hazardous air pollutant usage for the most recent month. HAP's to be included in this determination for individual HAP's are all of those which have the potential of exceeding 10 tons per year. All HAP's shall be included in this determination for combined HAP's.

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

**D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on daily 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 volume weighted VOC content of the coatings used for each or month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each day (or month); and
  - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAP usage for each month; and
  - (5) The weight of HAP's emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address(es) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Sport Graphics  
Source Address: 3423 Park Davis Circle  
Indianapolis, IN 46236  
Mailing Address: 3423 Park Davis Circle  
Indianapolis, IN 46236  
FESOP No.: 097-21383-00318

**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 46204-2251**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**  
**and**  
**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**  
**Air Compliance**  
**2700 South Belmont Avenue**  
**Indianapolis, IN 46221-2209**

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

Source Name: Sport Graphics  
Source Address: 3423 Park Davis Circle  
Indianapolis, IN 46236  
Mailing Address: 3423 Park Davis Circle  
Indianapolis, IN 46236  
FESOP No.: 097-21383-00318

**This form consists of 2 pages**

**Page 1 of 2**

- 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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
 AIR COMPLIANCE**

**FESOP Quarterly Report**

Source Name: Sport Graphics  
 Source Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 Mailing Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 FESOP No.: 097-21383-00318  
 Facility: EU2 and EU10  
 Parameter: VOC Emissions  
 Limit: Less than 25 tons per 12 consecutive month period with compliance determined at the end of each month for each unit

Quarter: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
Month 1	EU 2	EU10	EU2	EU10	EU2	EU10
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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
 AIR COMPLIANCE**

**FESOP Quarterly Report**

Source Name: Sport Graphics  
 Source Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 Mailing Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 FESOP No.: 097-21383-00318  
 Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU 14  
 Parameter: VOC Emissions  
 Limit: Less than 100 tons per consecutive 12 month period with compliance determined  
 at the end of each month for the units combined

Quarter \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
 AIR COMPLIANCE**

**FESOP Quarterly Report**

Source Name: Sport Graphics  
 Source Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 Mailing Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 FESOP No.: 097-21383-00318  
 Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU 14  
 Parameters: Individual HAP Emissions  
 Limits: Less than 10 tons per 12 consecutive month period with compliance determined at the end of each month for individual HAP's

Quarter: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Single Hap	Single Hap	Single Hap
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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
 AIR COMPLIANCE**

**FESOP Quarterly Report**

Source Name: Sport Graphics  
 Source Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 Mailing Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 FESOP No.: 097-21383-00318  
 Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU 14  
 Parameters: Combined HAP Emissions  
 Limits: Less than 25 tons per 12 consecutive month period with compliance determined at the end of each month for Combined HAP's

Quarter: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

**OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
 AIR COMPLIANCE**

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

Source Name: Sport Graphics  
 Source Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 Mailing Address: 3423 Park Davis Circle  
 Indianapolis, IN 46236  
 FESOP No.: 097-21383-00318

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Sport Graphics</b>
<b>Source Location:</b>	<b>3423 Park Davis Circle, Indianapolis, IN 46236</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2759</b>
<b>Operation Permit No.:</b>	<b>F097-12652-00318</b>
<b>Permit Renewal No.:</b>	<b>097-21383-00318</b>
<b>Permit Reviewer:</b>	<b>TJ Edwards</b>

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from Sport Graphics relating to the operation of a stationary printing operation.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

- (g) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.
- (h) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.
- (i) One (1) Komori Offset Lithographic 2 Color Press, identified as EU14, installed January 15, 2002, with a maximum line speed of 427.8 feet per minute, and a maximum printing width of 28 inches, using no controls, and exhausting inside the building.

### **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) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) 1.25 MMBtu/hr Web Press Gas Dryer, identified as EU 11, and venting to stack Number 1.
- (b) Paved and unpaved roads and parking lots with public access.

### **Existing Approvals**

The source has been operating under the previous FESOP 097-12652-00318 issued on March 6, 2001, with an expiration date of March 6, 2006, and the following amendments and revisions:

- (a) 097-15182-00318 issued on February 22, 2002
- (b) 097-19121-00318 issued on July 7, 2004

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) Administrative Amendment 097-15182-00318 issued on February 22, 2002.

Condition D.1.1 Volatile Organic Compounds (VOCs)[326 IAC 8][326 IAC 2-7-2] on page 22 of 32 of the FESOP.

Reason not incorporated: Because units EU1, EU3, EU4, and EU6 were removed they are no longer listed in the current permit. EU13 and EU14 were added and have been incorporated into this FESOP Renewal.

The portion of the condition D.1.1 of the permit that addresses emission units EU2 and EU10 has been retained for the following reason: The PTE has been re-evaluated for each press and it has been determined that EU2 and EU10 are limited to < 25 tons per year such that 326 IAC 8-1-6 does not apply and <100 tons per year such that 326 IAC 2-7 does not apply. EU12, EU13 and EU14 are no longer limited per re-evaluation of all presses.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on June 3, 2005.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A (pages 1- 11) of this document.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Negligible
PM-10	Negligible
SO <sub>2</sub>	Negligible
VOC	161.73
CO	0.5
NO <sub>x</sub>	Negligible

HAPs	Unrestricted Potential Emissions (tons/yr)
Single HAP (Xylene)	33.74
Combined HAPS	67.97

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) 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 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or 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 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 source has opted to remain a FESOP source. 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. The source's potential to emit is based on the emission units included in the original FESOP 097-12652-00318, Administrative Amendment 097-15182-00318, and this review and issuance.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
EU2	0	0	0	<25 (1)	<100 (2)	0	0	<10 (3) individual <25 (3) combined
EU5	0	0	0	NA		0	0	
EU7	0	0	0	NA		0	0	
EU8	0	0	0	NA		0	0	
EU9	0	0	0	NA		0	0	
EU10	0	0	0	<25 (1)		0	0	
EU12	0	0	0	NA		0	0	
EU13	0	0	0	NA		0	0	
EU14	0	0	0	NA		0	0	
EU11 (Insignificant Activities)	0	0	0	0	0.5	0	0	
Total Emissions	0	0	0	< 100 (2)	0.5	0	<10 (3) individual <25 (3) combined	

- (1) EU2 and EU10 are each limited to less than 25 tons of VOC usage per 12 consecutive month period with compliance determined at the end of each month such that 326 IAC 8-1-6 does not apply.
- (2) EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13, EU 14 and all insignificant activities are limited to less than 100 tons of VOC usage per 12 consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 does not apply.
- (3) All emitting units (EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU 14) are limited to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month and 10 tons per 12 consecutive month period with compliance determined at the end of each month. Such that 326 IAC 2-7 does not apply.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing 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/yr)
PM	None
PM-10	None
SO <sub>2</sub>	None
VOC	<100
CO	0.5

NO <sub>x</sub>	None
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) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

### Federal Rule Applicability

- (a) Affected facilities subject to 40 CFR 60 Subpart QQ applicability are publication rotogravure printing presses. All units used by the source are either offset lithography, heatset lithography, nonheatset lithography, or letterpress printing presses. None of these presses use a gravure cylinder such as is defined in Subpart QQ, so none of the facilities are publication rotogravure printing presses. 40 CFR 60 Subpart QQ is not included in this permit for this source. No other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are included in this permit.
- (b) This source is not subject to the requirements of 40 CFR 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry. This standard applies to major sources of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wide-web flexographic printing presses are operated. The printing presses at this source are not subject to the NESHAP, because they are not publication, product and packaging rotogravure printing presses, or wideweb flexographic printing presses, and they are not major for single HAP and combined HAPs.
- (c) This source is not subject to the requirements of 40 CFR 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry. This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place. The presses located at the source are not subject to this NESHAP because the source is not major source for single HAP and combined HAPs. Web coating in lithography is specifically exempted by § 63.3300(c).

### State Rule Applicability – Entire Source

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

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This source commenced construction and operation in 1995. This source was not deemed a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and no non-attainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no

modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3.

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

The operation of nine (9) Lithographic Press machines will limit emissions to less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs (see 326 IAC 2-8 below for emission limit details). Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8 (FESOP Program)

The source's potential to emit (PTE) before restrictions exceed the major source threshold for VOCs and HAPs established in 236 IAC 2-7-2, however the actual VOC and HAP emissions are below the major source thresholds. The contribution of insignificant activity VOC and HAP emissions are zero (see Appendix A). Therefore this source has opted to be permitted pursuant to 326 IAC 2-8. This source has accepted the following restrictions on PTE for VOCs and HAPs to stay below the major source thresholds:

- (a) The combined VOC usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.
- (b) Total individual HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.
- (c) The total combined HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU12, EU13 and EU14 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability – Individual Facilities

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

The requirements of 326 IAC 8-2-5 are not applicable to the two web offset lithographic printing presses EU10 and EU12. The source does not have in-line coaters where 100% of the substrate is covered such that 326 IAC 8-2-5 would apply.

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

This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing facilities existing as of November 1, 1980, which have potential VOC emissions of greater than one hundred (100) tons per year, or new facilities after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more VOC. The lithographic presses covered in this permit are not subject to the Graphic Arts Operations 326 IAC 8-5-5 because this rule only applies to flexographic and rotogravure presses.

### 326 IAC 8-1-6 (BACT)

This source commenced construction and operation after January 1, 1980. The requirements of 326 IAC 8-1-6 are not applicable to any of the presses, since the facilities with PTE of greater than 25 tons per year, EU 2 and EU10, are limited to less than 25 tons of VOC's per 12 consecutive month period with compliance determined at the end of each month, so that 326 IAC 8-1-6 does not apply. This source has accepted the following restrictions on PTE:

The VOC usage in EU2 and EU10 shall each be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month such that 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

## Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## 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, and OES, 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 in 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 stationary printing operation shall be subject to the conditions of the FESOP 097-21383-00318.

**Appendix A: Emissions Calculations**  
**VOC From Printing Press Operations**  
**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Sheetfed Press Calculations**

**Emission Unit ID EU2**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin2)	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	<sup>(4)</sup> Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin Sheetfed)	1.00	38.37%	5.00%	98,112	2,000	0.94
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	98,112	2,000	0.49

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	<sup>(5)</sup> Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	28.00	7.36	1.50	10.34
15476	Aqua Etch 724	6.00	1.36		0.41

**Total VOC (tpy) 12.18**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	Methylene Chloride	30.00	3.10
		Xylene	30.00	3.10
31585	Aqua Etch 724	Glycol Ether	10	0.04

**Total HAPs (tpy) 6.25**  
**Single HAP (tpy) 3.10**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Emission Unit ID EU5**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin2)	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	<sup>(4)</sup> Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin Sheet Fed)	1.50	19.80%	5.00%	19,622	2,000	0.15
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	19,622	2,000	0.10

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	<sup>(5)</sup> Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	27.81	7.36	2.00	7.70
15476	Aqua Etch 724	6.10	1.36		0.31

**Total VOC (tpy) 8.26**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	Methylene Chloride	30.00	2.31
		Xylene	30.00	2.31
31585	Aqua Etch 724	Glycol Ether	10	0.03

**Total HAPs (tpy) 4.65**  
**Single HAP (tpy) 2.31**

**Appendix A: Emissions Calculations**

**VOC From Printing Press Operations**

**Company Name: Sport Graphics**

**Address City IN Zip 3423 Park Davis Circle, Indianapolis, IN 46236**

**Permit Number: 097-21383-00318**

**Reviewer: TJ Edwards**

**Date: 8/9/2005**

**Emission Unit ID EU7**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin2)	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	<sup>(4)</sup> Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin Sheet Fed)	1.50	19.80%	5.00%	18,922	2,000	0.14
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	18,922	2,000	0.09

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	<sup>(5)</sup> Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	35.00	7.36	2.00	9.70
15476	Aqua Etch 724	7.70	1.36		0.39

**Total VOC (tpy) 10.32**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	Methylene Chloride	30.00	2.91
		Xylene	30.00	2.91
31585	Aqua Etch 724	Glycol Ether	10	0.04

**Total HAPs (tpy) 5.86**

**Single HAP (tpy) 2.91**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name:** Sport Graphics  
**Address City IN Zip:** 3423 Park Davis Circle, Indianapolis, IN 46236  
**Permit Number:** 097-21383-00318  
**Reviewer:** TJ Edwards  
**Date:** 8/9/2005

**Emission Unit ID** EU8

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	(1) Maximum Coverage (lbs/MMin2)	(3) Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	(4) Potential VOC Emissions (tpy)
15426	<b>Inks (Braden Sutphin Sheet Fed</b> 1.5		0.05	19822	2,000	0.15
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	19,822		0.10

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	(5) Potential VOC Emissions (tpy)	
15478	Solvent Blend S-1100	24.50	7.36	2.0	6.79	
15476	Aqua Etch 724	5.40	1.36		0.28	
<b>Total VOC (tpy)</b>						<b>7.31</b>

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)	
15478	Solvent Blend S-1100	Methylene Chloride	30.00	2.04	
		Xylene	30.00	2.04	
31585	Aqua Etch 724	Glycol Ether	10	0.03	
<b>Total HAPs (tpy)</b>					<b>4.10</b>
<b>Single HAP (tpy)</b>					<b>2.04</b>

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations  
Company Name: Sport Graphics  
Address City IN Zip: 3423 Park Davis  
Permit Number: 097-21383-00318  
Reviewer: TJ Edwards  
Date: 8/9/2005**

**Emission Unit ID EU9**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin2)	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	<sup>(4)</sup> Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin Sheetfed)	1.00	38.37%	5.00%	3,942	2,000	0.04
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	3,942	2,000	0.02

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	<sup>(5)</sup> Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	28.00	7.36	1.50	10.34
15476	Aqua Etch 724	6.00	1.36		0.41

**Total VOC (tpy) 10.81**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	Methylene Chloride	30.00	3.10
		Xylene	30.00	3.10
31585	Aqua Etch 724	Glycol Ether	10	0.04

**Total HAPs (tpy) 6.25  
Single HAP (tpy) 3.10**

**Appendix A: Emissions Calculations**  
**VOC From Printing Press Operations**  
**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Emission Unit ID EU13**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	(1) Maximum Coverage (lbs/MMin2)	(2) VOC Content (wt%)	(3) Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	(4) Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin)	1.50	19.80%	5.00%	127,546	2,000	0.95
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	127,546	2,000	0.63

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	(5) Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	608.65	7.36		11.629
31595	Autowash 6000	340.80	6.48		5.733
31584	Alkaless P	68.50	5.2	29.00	0.925
31585	Fountain Concentrate 2451	137.40	2.21		0.788

**Total VOC (tpy) 20.65**

*HAP Emissions*

MSDS #	Product Name	IP Constitu	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	hylene Chlc	30.00	3.49
		Xylene	30.00	3.49
31585	Fountain Concentrate 2451	hylene Glyc	10	0.08

**Total HAPs (tpy) 7.06**  
**Single HAP (tpy) 3.49**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Emission Unit ID EU14**

*VOC Emissions from Inks and Coatings*

MSDS #	Product Type	(1) Maximum Coverage (lbs/MMin2)	(2) VOC Content (wt%)	(3) Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	(4) Potential VOC Emissions (tpy)
15426	Inks (Braden Sutphin Sheet Fed)	1.50	19.80%	5.00%	107,923	2,000	0.80
15423	Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	107,923	2,000	0.53

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	(5) Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	225.00	7.36	13.00	9.590
15476	Aqua Etch 724	49.30	1.36		0.388

**Total VOC (tpy) 11.31**

*HAP Emissions*

MSDS #	Product Name	AP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	hylene Chloride	30.00	2.88
		Xylene	30.00	2.88
31585	Aqua Etch 724	Glycol Ether	10	0.04

**Total HAPs (tpy) 5.79**  
**Single HAP (tpy) 2.88**

**Web Press Calculations**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Emission Unit ID EU10**

*VOC Emissions from Inks*

MSDS #	Product Type	(1) Maximum Coverage (lbs/MMin2)	(2) VOC Content (wt%)	(3) Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	(4) Potential VOC Emissions (tpy)
56344	Inks (Braden Web Heatset Commodore)	1.25	36.00%	80.00%	174,129	2,000	31.34

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	(5) Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	1428.70	7.36	22.00	35.98
15476	Aqua Etch 724	313.40	1.36		1.46

**Total VOC (tpy) 68.78**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	thylene Chlo	30.00	10.79
		Xylene	30.00	10.79
31585	Aqua Etch 724	Glycol Ether	10	0.15

**Total HAPs (tpy) 21.74**  
**Single HAP (tpy) 10.79**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Sport Graphics**  
**Address City IN Zip 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Emission Unit ID EU12**

*VOC Emissions from Inks*

MSDS #	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin2)	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin2/Year	2000 (lbs/ton)	<sup>(4)</sup> Potential VOC Emissions (tpy)
15479	Inks (Braden Web Coldset Web Forms)	1.50	38.37%	5.00%	88,326	2,000	1.27

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Actual Usage (gal/yr)	VOC Content (lb/gal)	Estimated Operating Capacity (%)	<sup>(5)</sup> Potential VOC Emissions (tpy)
15478	Solvent Blend S-1100	206.50	7.36	11.00	10.402
15476	Aqua Etch 724	45.30	1.36		0.422

**Total VOC (tpy) 12.09**

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
15478	Solvent Blend S-1100	Methylene Chloride	30.00	3.12
		Xylene	30.00	3.12
31585	Aqua Etch 724	Glycol Ether	10	0.04

**Total HAPs (tpy) 6.28**  
**Single HAP (tpy) 3.12**

**Appendix A: Emissions Calculations  
VOC From Printing Press Operations**

**Company Name: Sport Graphics**  
**Address City IN Zip 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

**Source Wide Emission Summary**

Pollutant	Potential Emission (tpy)
VOC	161.73
Single HAP (Xylene)	33.74
Combined HAPs	67.97

**Methodology**

<sup>(1)</sup> Maximum coverage is the same used for the original FESOP

<sup>(2)</sup> VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press

<sup>(3)</sup> Flash off % is determined from the EPA CTG Document for Offset Lithographic Printing

<sup>(4)</sup> VOC PTE from Inks and Varnishes (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Max

<sup>(5)</sup> VOC PTE from Press Cleaning and Fountain Solution (tpy) = Actual VOC Emissions (tpy) x 8,760 (hr/yr) / (Hours of Production (hr/yr) x Oper:

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Natural Gas Dryer, EU11**

**Company Name: Sport Graphics**  
**Address City IN Zip: 3423 Park Davis Circle, Indianapolis, IN 46236**  
**Permit Number: 097-21383-00318**  
**Reviewer: TJ Edwards**  
**Date: 8/9/2005**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.3	11.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	**see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.5

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPs Emissions Calculations**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.150E-05	6.570E-06	4.106E-04	9.855E-03	1.862E-05

  

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.738E-06	6.023E-06	7.665E-06	2.081E-06	1.150E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.