

TO: Interested Parties / Applicant

FROM: John B. Chavez, Administrator
Office of Environmental Services
City of Indianapolis

RE: **Permit # F097-21417-00298**

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental, 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, 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, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within fifteen (15) days from the date of this notice**. The filing 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); or
- (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, the name of the applicant, location, the date of this notice, and the following:

- (1) the name and address of the person making the request; and
- (2) the interest of the person making the request; and
- (3) identification of any persons represented by the person making the request; and
- (4) the reasons, with particularity, for the request; and
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Environmental Services, Permits Section at (317) 327-2234.

Enclosures

August 8, 2005

CERTIFIED MAIL 7000 0600 0023 5188 3212

Mr. Greg Flora
Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201

Re: 097-21417-00298
First Minor Revision to
FESOP 097-14820-00298

Dear Mr. Flora:

Print Communications was issued a FESOP on October 17, 2002 for a stationary lithographic printing operation. A letter requesting changes to this permit was received on June 10, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following:

- (a) Addition of one (1) Harris M130 web heatset offset lithographic printing press (identified as EU15);
- (b) Addition of two (2) drying ovens each rated at 1.00 MMBtu per hour used in conjunction with one (1) Harris M130 web heatset offset lithographic printing press (identified as EU15);
- (c) Addition of one (1) Kodak Printer Press (identified as DI); and
- (d) Removal of the existing Harris 200 heatset web lithographic press.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.



5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

If you have any questions concerning the proposed Minor Permit Revision please do not hesitate to contact Sanobar Durrani at ERG, Inc. at (919) 468-7810.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Manager of Environmental Planning

Attachments: Revised Permit

ERG/SD

cc: File – Marion County Health Department
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn

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

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

**Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201**

(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.

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.: F097-14820-00298	
Issued by: John Chavez, Administrator Office of Environmental Services	Issuance Date: October 17, 2002 Expiration Date: October 17, 2007
First Administrative Amendment: AAF 097-18447-00298, issued December 13, 2003 Second Administrative Amendment: 097-19534-00298, issued August 4, 2004	
First Minor Permit Revision No.: 097-21417-00298	Affected Pages:4, 5, 21, 22, 23, 28, and 29
Issued by: ORIGINAL SIGNED BY: Felicia A. Robinson Manager of Environmental Planning	Issuance Date: August 8, 2005



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Five (5) heatset web lithographic presses, EU-2, EU-9, EU-13, EU-14, EU-15

Three (3) non-heatset web lithographic presses, EU-7, EU-11, EU-12

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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) City of 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)]

The Permittee owns and operates a stationary lithographic printing operation that prints and publishes books.

Authorized individual: President
Source Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
SIC Code: 2759
Source Location Status: Marion County
County Status: Nonattainment for 8 hour ozone and 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)]

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

- (a) Emitting unit number one, identified as EU-1, is a Heidelberg MO nonheatset sheetfed lithographic press with a maximum process capacity of 5.82 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (b) Emitting unit number two, identified as EU-2, is a Harris M110 heatset web lithographic press with a maximum process capacity of 18.72 million cubic inches per hour. The emissions from this process are exhausted at stack one identified as SV-1.
- (c) Emitting unit number seven, identified as EU-7, is a Diddie Glaser nonheatset web lithographic press with a maximum process capacity of 7.56 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (d) Emitting unit number nine, identified as EU-9, is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-2.
- (e) Emitting unit number eleven, identified as EU-11, is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (f) Emitting unit number twelve, identified as EU-12, is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 46.44 million square inches per hour. Emissions from this emission unit are exhausted into the building.

- (g) Emitting unit number thirteen, identified as EU-13, is A Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-5.
- (h) Emitting unit number fourteen, identified as EU-14 is a Harris M300 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-6.
- (i) Emitting unit number fifteen, identified as EU-15, is a Harris M130 web heatset offset lithographic press with a maximum process capacity of 302,947 million square inches per year.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than 10 million (1,000,000) Btu per hour.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (c) PrePress Area.
- (d) Ryobi lithographic nonheatset sheet fed press.
- (e) One (1) sheetfed UV coater.
- (f) Two (2) drying ovens, each rated at 1.00 MMBtu per hour.
- (g) One (1) Kodak printer press.

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) 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]

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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]

- (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 the City of Indianapolis Office of Environmental Services.

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

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

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

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section

2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

- (b) 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 or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)][326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 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.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (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.13 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 maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and OES within a reasonable time.

B.14 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 describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ or OES, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) 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.

- (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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 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.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and/or 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 IDEM, OAQ or 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 IDEM, OAQ or OES, at least thirty (30) days in advance of the date this permit is to be

reopened, except that IDEM, OAQ or OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (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/or OES on or before the date it is due.
- (2) If IDEM, OAQ and/or 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/or 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.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application should 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)]

B.19 Operational Flexibility [326 IAC 2-8-15]

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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), (c)(1), and (d).

- (6) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) 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).
- (d) 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.

B.20 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.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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, and 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 14-10-4 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) **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 that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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)]

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]

Any monitoring or testing performed 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]

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.13 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information 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 kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or OES 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.14 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do 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.15 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Emitting unit number one, identified as EU-1, is a Heidelberg MO nonheatset sheetfed lithographic press with a maximum process capacity of 5.82 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (b) Emitting unit number two, identified as EU-2, is a Harris M110 heatset web lithographic press with a maximum process capacity of 18.72 million cubic inches per hour. The emissions from this process are exhausted at stack one identified as SV-1.
- (c) Emitting unit number seven, identified as EU-7, is a Diddie Glaser nonheatset web lithographic press with a maximum process capacity of 7.56 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (d) Emitting unit number nine, identified as EU-9, is A Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-2.
- (e) Emitting unit number eleven, identified as EU-11, is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (f) Emitting unit number twelve, identified as EU-12, is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 46.44 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- (g) Emitting unit number thirteen, identified as EU-13, is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-5.
- (h) Emitting unit number fourteen, identified as EU-14 is a Harris M300 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-6.
- (i) Emitting unit number fifteen, identified as EU-15, is a Harris M130 web heatset offset lithographic press with a maximum process capacity of 302,947 million square inches per year.

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

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

D.1.1 VOC FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6] [326 IAC 2-3]

- (a) The amount of VOC delivered to EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15, shall not exceed ninety-five and six tenths (95.6) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is structured such that when including the emissions of the insignificant activities, the total source VOC emissions remain below one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 2-2 (Prevention of

Significant Deterioration), 326 IAC 2-3 (Emission Offset) and 40 CFR 52.21 not applicable.

- (b) The amount of VOC delivered to each press identified as EU-2, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15 shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 and 326 IAC 2-3 not applicable.
- (c) Any change or modification which may increase the potential emissions of VOC from printing press EU-1 or EU-7 to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the IDEM, OAQ and OES before any such change may occur. This will render the requirements of 326 IAC 8-1-6 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR Part 52, Subpart P]

Pursuant to F097-7708-00298 issued on March 16, 1998 and 40 CFR 52 Subpart P, the particulate matter (PM) from EU-1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 (Preventative Maintenance Plan) of this permit, is required for EU-2, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions 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 reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies), the allowable particulate emission rate from the trimming operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
FESOP No.: F097-14820-00298

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

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

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana, 46201
FESOP No.: F097-14820-00298

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES
 FESOP Quarterly Report
 Print Communications
 2457 East Washington Street
 Indianapolis, Indiana 46201
 FESOP No.: F097-14820-00298**

Facility: EU-2, EU-9, EU-11, EU-12, EU-13, EU-14, EU-15
 Parameter: VOC Emissions
 Limit: Each unit shall not emit more than 25 tons of VOC per 12 consecutive month period

YEAR: _____

Month	Units	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	EU-2			
	EU-9			
	EU-11			
	EU-12			
	EU-13			
	EU-14			
Month 2	EU-2			
	EU-9			
	EU-11			
	EU-12			
	EU-13			
	EU-14			
Month 3	EU-2			
	EU-9			
	EU-11			
	EU-12			
	EU-13			
	EU-14			

- 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
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report
Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201
FESOP No.: F097-14820-00298**

Facility: EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, EU-15
Parameter: VOC Emissions
Limit: 95.6 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	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
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

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

**Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201
FESOP No.: F097-14820-00298**

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	Print Communications
Source Location:	2457 East Washington Street, Indianapolis, Indiana, 46201
County:	Marion
SIC Code:	2759
Operation Permit No.:	F097-14820-00298
Operation Permit Issuance Date:	October 17, 2002
Permit Revision No.:	097-21417-00298
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a revision application from Print Communications relating to the following modifications.

- (a) Addition of one (1) Harris M130 web heatset offset lithographic printing press (identified as EU15);
- (b) Addition of two (2) drying ovens each rated at 1.00 MMBtu per hour used in conjunction with one (1) Harris M130 web heatset offset lithographic printing press (identified as EU15);
- (c) Addition of one (1) Kodak Printer Press (identified as DI); and
- (d) Removal of the existing Harris 200 heatset web lithographic press.

History

On June 10, 2005, Print Communications submitted a permit revision application to IDEM, OAQ and OES requesting permission to construct and operate one (1) lithographic printing press (identified as EU15), two (2) drying ovens and one (1) Kodak printer press (identified as DI). The Permittee also requested permission to remove the existing lithographic printing press (identified as EU4) from the source.

Print Communications was issued a Federally Enforceable State Operating Permit (FESOP) No. 097-14820-00298 on October 17, 2002.

Existing Approvals

The source was issued FESOP No. 097-14820-00298 on October 17, 2002. The source has since received the following:

- (a) First Administrative Amendment No. 097-18447-00298, issued December 18, 2003.
- (b) Second Administrative Amendment No. 097-19534-00298, issued August 4, 2004.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on June 10, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

Potential to Emit of the Revision

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential Emissions (tons/year)
PM	0.07
PM10	0.07
SO ₂	0.01
VOC	146
CO	0.74
NO _x	0.88

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Xylene	0.01
Toluene	0.0069
Methyl Alcohol	0.01
Hydroquinone	2.92E-03
TOTAL	0.05

Justification for Revision

The FESOP is being modified through a FESOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(7) because the potential VOC emissions from the new lithographic printing press (EU15) are limited to less than 25 tons per year to avoid the requirements of BACT (326 IAC 8-1-6).

Potential to Emit After Revision

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Press EU-1	1.27	1.27	0	Less than 95.6 tons per twelve (12) consecutive month period with compliance Determined at the end of each month	0	0	Less than 10 for a single HAP and 25 for any combination of HAPs.
* Press EU-2	0	0	0		0	0	
Press EU-4	0	0	0		0	0	
* Press EU-7	0	0	0		0	0	
* Press EU-9	0	0	0		0	0	
* EU-11	0	0	0		0	0	
* EU-12	0	0	0		0	0	
* EU-13	0	0	0		0	0	
* EU-14	0	0	0		0	0	
Insignificant Activities	Negligible	Negligible	Negligible		Negligible	Negligible	
* New Press EU-15	0	0	0		0	0	
New Kodak Printer Press	0	0	0		0	0	
Drying Ovens	0.07	0.07	0.01		0.74	0.88	Negligible
Total PTE of the Entire Source after Revision	1.34	1.34	0.01		0.74	0.88	Less than 10 for a single HAP and 25 for any combination of HAPs.
FESOP Threshold Levels	< 100	<100	<100	<100	<100	<100	Less than 10 for a single HAP and 25 for any combination of HAPs.

The potential to emit of the existing units are from the 1st Administrative Amendment to FESOP No. 097-14820-00298, issued October 17, 2002.

* The potential VOC emissions from each of the presses identified as EU-2, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15 are limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month to avoid the provisions of 326 IAC 8-1-6.

After the addition of the lithographic printing press (EU15) and Kodak printer press (D1) and the removal of lithographic printing press (EU4), the potential to emit of the criteria pollutants from the entire source is still less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Maintenance Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) 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.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions 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 nonattainment new source review.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (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.

Federal Rule Applicability

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

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 14) because this source does not operate a rotogravure or wide-web flexographic printing presses. The Permittee operates under the provisions of 326 IAC 2-8 (FESOP) which limits hazardous air pollutants (HAPs) emissions to less than major source thresholds.
- (c) This source is not subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ - National Emission

Standards for Hazardous Air Pollutants: Paper and other Web Coating because the Permittee operates under the provisions of 326 IAC 2-8 (FESOP) which limits hazardous air pollutants (HAPs) emissions to less than major source thresholds.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

- (a) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Print Communications has a limited potential to emit of PM₁₀ below 100 tpy. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, the provisions of 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Marion County was designated as nonattainment for ozone on June 15, 2004. Print Communications, located in Marion County, is a minor source under Emission Offset (326 IAC 2-3) because the potential VOC emissions from the entire source are limited to less than 100 tons per year. On June 10, 2005 the Permittee submitted an application requesting permission to modify their facility as follows:
 - (1) Addition of one (1) Harris M130 web heatset offset lithographic printing press, (identified as EU15);
 - (2) Addition of two (2) drying ovens each rated at 1.00 MMBtu per hour used in conjunction with one (1) Harris M130 web heatset offset lithographic printing press (identified as EU15);
 - (3) Addition of one (1) Kodak Printer Press (identified as DI); and
 - (4) Removal of the existing Harris 200 heatset web lithographic press.

The potential VOC emissions from EU15 are equal to 146 tons per year. However, the Permittee has requested a limit on the amount of VOC delivered to the press not to exceed twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit renders the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (BACT) not applicable for this modification.

The potential to emit of NO_x remains less than 100 tons per year.

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

Print Communications was constructed in 1990 and is not in one (1) of the twenty-eight (28) listed source categories. It is located in Marion County which is designated as attainment for PM₁₀, SO₂, and CO.

After this modification, the potential to emit of PM₁₀, SO₂, and CO remain less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2(PSD) are not applicable.

326 IAC 2-4.1(Major Source of Hazardous Air Pollutants (HAPs))

The potential to emit of HAPs from the entire source, including this modification is limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for any

combination of HAPs pursuant to 326 IAC 2-8 (FESOP). Therefore, this modification is not subject to the provisions of 326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants).

326 IAC 2-8 (FESOP)

The Permittee has requested to continue to comply with the provisions of 326 IAC 2-8 (FESOP) as described in their Permit No. 097-14820-00298, issued October 17, 2002 as follows:

The amount of VOC delivered to the printing presses, including this modification, are limited to less than 95.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the VOC emissions from the insignificant sources, the VOC emissions from the entire source are limited to less than 100 tons per (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has limited the potential to emit of each criteria pollutant to less one hundred (100) tons per year.

326 IAC 5-1 (Visible Opacity Limitations)

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

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

State Rule Applicability – Printing Presses (EU-15 and Kodak DI)

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

- (a) The provisions of 326 IAC 8-1-6 are not applicable to the Kodak printing press (identified as DI) because it has potential VOC emissions less than twenty-five (25) tons per year.
- (b) The Permittee has requested the potential VOC emissions from one (1) web heatset offset lithographic printing press (EU-15) to be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit renders the provisions of 326 IAC 8-1-6 not applicable.

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

The requirements of 326 IAC 8-2-5 (Paper Coating Operations) are not applicable to the lithographic printing press (identified as EU-15) or Kodak printer press (identified as DI) because these units do not web coat or saturate paper, plastic, metal foil, or pressure sensitive tapes and labels.

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

The one (1) web heatset offset lithographic printing press (identified as EU-15) and Kodak printing press (identified as DI) are not subject to the provisions of 326 IAC 8-5-5 (Graphic Arts Operation) because this rule only applies to flexographic and rotogravure presses whereas this source operates only lithographic printing presses. They are used for book printing and publishing purposes.

State Rule Applicability – Drying Ovens

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations)

The provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations) are not applicable to the two (2) drying ovens because the particulate emissions from these units are from natural gas combustion only.

326 IAC 6-2-4 (Particulate Emission Limitations from Sources of Indirect Heating)

The provisions of 326 IAC 6-2-4 (Particulate Emission Limitations from Sources of Indirect Heating) are not applicable to the two (2) drying ovens because these units are not process heaters or boilers.

Testing Requirements

VOC testing is not required for the new printing presses because compliance shall be demonstrated based on record keeping as described in the existing FESOP.

Compliance Requirements

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

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

There are no compliance monitoring requirements applicable to this modification.

Proposed Changes

Language with a line through it has been deleted, while bold language has been added. The TOC has been updated as necessary.

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

...

~~(c) — Emitting unit number four, identified as EU-4, is a Harris M200 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-3.~~

(dc) Emitting unit number seven, identified as EU-7, is a Diddie Glaser nonheatset web lithographic press with a maximum process capacity of 7.56 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.

(ed) Emitting unit number nine, identified as EU-9, is A Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per

hour. The emissions from this emission unit are exhausted at stack two identified as SV-2.

- (fe) Emitting unit number eleven, identified as EU-11, is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (gf) Emitting unit number twelve, identified as EU-12, is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 46.44 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- (hg) Emitting unit number thirteen, identified as EU-13, is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-5.
- (ih) Emitting unit number fourteen, identified as EU-14 is a Harris M300 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-6.
- (i) **Emitting unit number fifteen, identified as EU-15, is a Harris M130 web heatset offset lithographic press with a maximum process capacity of 302,947 million square inches per year.**

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

- ...
- (f) **Two (2) drying ovens, each rated at 1.00 MMBtu per hour.**
- (g) **One (1) Kodak printer press.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Emitting unit number one, identified as EU-1, is a Heidelberg MO nonheatset sheetfed lithographic press with a maximum process capacity of 5.82 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (b) Emitting unit number two, identified as EU-2, is a Harris M110 heatset web lithographic press with a maximum process capacity of 18.72 million cubic inches per hour. The emissions from this process are exhausted at stack one identified as SV-1.
- ~~(c) Emitting unit number four, identified as EU-4, is a Harris M200 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-3.~~
- (dc) Emitting unit number seven, identified as EU-7, is a Diddie Glaser nonheatset web lithographic press with a maximum process capacity of 7.56 million cubic inches per hour. The unit is not equipped with control equipment and exhausts back into the building.

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

- (ed) Emitting unit number nine, identified as EU-9, is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-2.
- (fe) Emitting unit number eleven, identified as EU-11, is a King Press, Print King IV nonheatset lithographic web press with a maximum process capacity of 16.38 million square inches per hour. The unit is not equipped with control equipment and exhausts back into the building.
- (gf) Emitting unit number twelve, identified as EU-12, is a King Press, Newscolor IV nonheatset lithographic web press with a maximum process capacity of 46.44 million square inches per hour. Emissions from this emission unit are exhausted into the building.
- (hg) Emitting unit number thirteen, identified as EU-13, is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted at stack two identified as SV-5.
- (ih) Emitting unit number fourteen, identified as EU-14 is a Harris M300 heatset web lithographic press with a maximum process capacity of 25.92 million cubic inches per hour. Emissions from this process are exhausted at stack three identified as SV-6.
- (i) **Emitting unit number fifteen, identified as EU-15, is a Harris M130 web heatset offset lithographic press with a maximum process capacity of 302,947 million square inches per year.**

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

D.1.1 VOC FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6] **[326 IAC 2-3]**

- (1a) The amount of VOC delivered to EU-1, EU-2, ~~EU-4~~, EU-7, EU-9, EU-11, EU-12, EU-13, ~~and EU-14~~, **and EU-15**, shall not exceed ninety-five and six tenths (95.6) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is structured such that when including the emissions of the insignificant activities, the total source VOC emissions remain below one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 2-2 (Prevention of Significant Deterioration), **326 IAC 2-3 (Emission Offset)** and 40 CFR 52.21 not applicable.
- (2b) The amount of VOC delivered to each press identified as EU-2, ~~EU-4~~, EU-9, EU-11, EU-12, EU-13, ~~and EU-14~~, **and EU-15** shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 **and 326 IAC 2-3** not applicable.
- (3c) Any change or modification which may increase the potential emissions of VOC from printing press EU-1 or EU-7 to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the IDEM, OAQ and OES before any such change may occur. This will render the requirements of 326 IAC 8-1-6 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 (Preventative Maintenance Plan) of this permit, is required for EU-2, ~~EU-4~~, EU-9, EU-11, EU-12, EU-13, ~~and EU-14, and EU-15.~~

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

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

~~D.1.5 VOC Emissions~~

~~Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.~~

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

D.1.65 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through ~~(65)~~ below. Records maintained for (1) through ~~(65)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- ~~(1) The amount and VOC content of each coating material and solvent used for each month. 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;~~
- (1) **The VOC content of each coating material and solvent used.**
- (2) **The amount of coating material and solvent less water used on monthly basis.**
- (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
- (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
- ~~(23) The cleanup solvent usage for each month;~~
- ~~(34) The total VOC usage for each month; and~~
- (45) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.76 Reporting Requirements

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES
 FESOP Quarterly Report
 Print Communications
 2457 East Washington Street
 Indianapolis, Indiana 46201
 FESOP No.: F097-14820-00298**

Facility: EU-2, ~~EU-4~~, EU-9, EU-11, EU-12, EU-13, EU-14, **EU-15**
 Parameter: VOC Emissions
 Limit: Each unit shall not emit more than 25 tons of VOC per 12 consecutive month period

YEAR: _____

This form consists of 2 pages

Page 1 of 2

Month	Units	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	EU-2			
	EU-4			
	EU-9			
	EU-11			
	EU-12			
	EU-13			
	EU-14			
Month 2	EU-15			
	EU-2			
	EU-4			
	EU-9			
	EU-11			
	EU-12			
	EU-13			
Month 3	EU-14			
	EU-15			
	EU-2			
	EU-4			
	EU-9			
	EU-11			
	EU-12			

Page 2 of 2

- 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
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report
Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201
FESOP No.: F097-14820-00298**

Facility: EU-1, EU-2, ~~EU-4~~, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, **EU-15**
Parameter: VOC Emissions
Limit: 95.6 tons of VOC per twelve (12) consecutive month period **with
compliance determined at the end of each month**

Upon further review IDEM, OAQ and OES have decided to make the following changes:

1. The mailing address for IDEM, OAQ has been changed throughout the permit.

Indiana Department of Environmental Management
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

Conclusion

This permit revision shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No.: 097-21417-00298.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Dryers, each rated at 1.00 MMBtu/hour**

Company Name: Printing Communications, Inc.
Address: 2457 East Washington Street, Indianapolis, Indiana 46201
MPR to FESOP: 097-21417
Pit ID: 097-00298
Reviewer: ERG/SD
Date: June 29, 2005

Heat Input Capacity
MMBtu/hour

Potential Throughput
MMCF/year

2.0 (2 Units Total)

17.5

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.07	0.07	0.01	0.88	0.05	0.74

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

**Emission Factors for NO_x: Uncontrolled = 100 lb/MMCF

METHODOLOGY

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Dryers, each rated at 1.00 MMBtu/hour

Company Name: Printing Communications, Inc.

Address: 2457 East Washington Street, Indianapolis, Indiana 46201

MPR to FESOP: 097-21417

Plt ID: 097-00298

Reviewer: ERG/SD

Date: June 29, 2005

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations
VOC and HAP Emissions
From M130 HeatSet Offset Lithographic Printing Press**

Company Name: Printing Communications, Inc.

Address: 2457 East Washington Street, Indianapolis, Indiana 46201

MPR to FESOP: 097-21417

Pit ID: 097-00298

Reviewer: ERG/SD

Date: June 29, 2005

Press

Press ID	Max. Line Speed (feet/minute)	Max. Print Width (inches)	Max. Throughput (MMin ² /year)	Max. Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
EU15	1,264	38	302,947	3.35	35%	80%	142

Press Cleaning & Fountain Solution

Press ID	Material	Density (lbs/gal)	Annual Usage (gal/year)	Weight % Xylene	Flash Off %	PTE of Xylene (tons/year)	PTE of VOC (tons/year)
EU15	A-124 Blanket/Roller Wash (Chemcentral)	6.99	260	1.10%	100%	0.01	2.11

METHODOLOGY

Press

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

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

Press Cleaning & Fountain Solution

PTE of Xylene (tons/year) = Density (lbs/gal) * Annual Usage (gal/year) * Weight % HAP * Flass Off % * 1 ton/2000 lbs

PTE of VOC (tons/year) = Actual VOC Emissions (tons/year) * 8760 hours/year * 1/Hours of Production (hours/year) * 1/ Percent Max. Operating Capacity (80%)

**Appendix A: Emissions Calculations
Summary Emissions**

Company Name: Printing Communications, Inc.

Address: 2457 East Washington Street, Indianapolis, Indiana 46201

MPR to FESOP: 097-21417

Plt ID: 097-00298

Reviewer: ERG/SD

Date: June 29, 2005

Potential To Emit from the Modification (tons per year)

	PM	PM10	SO₂	NO_x	VOC	CO	Total HAPs
Drying Ovens	0.07	0.07	0.01	0.88	0.05	0.74	0.016
M130 - Press	0.0	0.0	0.0	0.0	142	0.0	0.000
Press M130 Cleaning & Fountain Solution	0.0	0.0	0.0	0.0	2.11	0.0	0.010
Kodak Press Printer	0.0	0.0	0.0	0.0	1.16	0.0	0.000
Kodak Direct Press Cleaning & Fountain Solution	0.00	0.00	0.00	0.00	0.28	0.0	0.024
Total Source Emissions	0.07	0.07	0.01	0.88	146	0.74	0.05