

Mr. Greg Schofield
Standard Register Company
1251 North Fruitridge
Terre Haute, IN 47804

August 31, 2005

Re: 167-21634
First Administrative Amendment to
FESOP 167-15712-00060

Dear Mr. Schofield:

Standard Register Company was issued a permit on December 6, 2004 for flexographic printing operation. A letter requesting the following changes: install one (1) press P150 and remove one (1) press P139 was received on August 12, 2005. The press being added replaces the press being removed and is the same type of equipment already permitted. By removing and replacing this equipment the source will still be able to comply with existing permit requirements and terms. There are no new state or federal rules which apply to these new units. Therefore, pursuant to the provisions of 326 IAC 2-8-10(a)(14), the permit is hereby administratively amended as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

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:

1. One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.
2. One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.
3. One (1) web press (Model 88-1234) which is identified as P117. This press was installed in 1989.
4. One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.
5. One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.
6. One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.
7. One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.
- ~~8. One (1) web press (Model 85-1638) which is identified as P139. This press was installed in 1987.~~
- 8. One (1) Comco Cadet web press which is identified as P150. This press was installed in 2005.**
9. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
10. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P124. This press was installed in 2000.
11. One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.
12. Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as P114 and P115. These presses were installed in 2001.

13. One (1) four (4) color, sixteen inch Comco Press with a Scitex Imaging Unit, identified as #491. This press was installed in 2001
13. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P109. This press was installed in 2001.
14. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P107. This press was installed in 2003.
15. One (1) one (1) color, eighteen inch Comco Press with High-Capacity Dryers, identified as P145. This press was installed in 2003.
16. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #2. This unit was installed in 2003.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.
- (b) One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.
- (c) One (1) web press (Model 88-1234) which is identified as P117. This press was installed in 1989.
- (d) One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.
- (e) One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.
- (f) One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.
- (g) One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.
- ~~8. One (1) web press (Model 85-1638) which is identified as P139. This press was installed in 1987.~~
- (h) One (1) Comco Cadet web press which is identified as P150. This press was installed in 2005.**
- (i) One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
- (j) One (1) five (5) color flexographic printing press (Model Commander) which is identified as P124. This press was installed in 2000.
- (k) One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.
- (l) Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as P114 and P115. These presses were installed in 2001.
- (m) One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P109. This press was installed in 2001.
- (n) One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P107. This press was installed in 2003.
- (o) One (1) one (1) color, eighteen inch Comco Press with High-Capacity Dryers, identified as P145. This press was installed in 2003.
- (p) One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #2. This unit was installed in 2003.

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 8-5-5] [326 IAC 2-8-4] [326 IAC 2-1.1-5]

- (a) The source shall not exceed a total of 96 tons of VOC being fed to the emissions units combined (presses P107, P109, P113, P114, P115, P117, P118, P121, P122, P124, P123, P127, ~~P139~~, **P150**, P140, P145, Scitex Mobile Unit #1, Scitex Mobile Unit #2) per 12 consecutive months with compliance determined at the end of each month.
- (b) The the total VOC usage of coatings, washes, inks, additives, cleaning materials, clean up solvents, and other coatings for each emissions unit (presses P107, P109, P113, P114, P115, P117, P118, P121, P122, P123, P124, P127, ~~P139~~, **P150**, P140, P145, Scitex #1, Scitex #2) shall not exceed 24 tons per 12 consecutive months with compliance determined at the end of each month for each emissions unit.

On page 31 of the FESOP permit press P139 has been changed to press P150.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Scott Sines, at (812) 462-3433, extension 12.

Sincerely,

Original Signed By:

George M. Needham
Director
Vigo County Air Pollution Control

Attachments: Appendix A & Revised Pages
SBS

cc: Mindy Hahn - IDEM
Winter Bottum - IDEM

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY
and
Vigo County Air Pollution Control**

Standard Register Company
1251 North Fruitridge Avenue
Terre Haute, Indiana 47804

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, 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.: F167-15712-00060	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: December 6, 2004

First Administrative Amendment F167-21634	Pages Affected: 4, 5, 23, 24, 31
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: August 31, 2005

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

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

The Permittee owns and operates a flexographic printing operation.

Responsible Official: Plant Manager
Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address: Same as Source Address
SIC Code: 2761
County Location: Vigo
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Major Source, under Emission Offset Rules;

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:

1. One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.
2. One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.
3. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.
4. One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.
5. One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.
6. One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.
7. One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.
8. One (1) Comco Cadet web press which is identified as P150. This press was installed in 2005.
9. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
10. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P124. This press was installed in 2000.
11. One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.
12. Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as P114 and P115. These presses were installed in 2001.
13. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P109. This press was installed in 2001.
14. One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P107. This press was installed in 2003.
15. One (1) one (1) color, eighteen inch Comco Press with High-Capacity Dryers, identified as P145. This press was installed in 2003.
16. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #2. This unit was installed in 2003.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

NOTE: The CYREL plate processing unit is used to produce all of the Flexographic plates used at the facility. Production from this unit is 2 plates in 2.5 hours. The process is a closed loop operation in which the solvent (CYREL Washout Solution) is only exposed during installation and removal of a plate from the processor unit. The solvent is replenished continuously at a rate of 6.8 pounds/hour during operation and the used solvent is recycled. The actual solvent losses during processing amount to 4% by weight. These emissions are fugitive. Fugitive VOC emissions are 0.27 pounds/hour. The solvent is 75 wt% Perchloroethylene. Waste solvent is manifested for offsite disposal.

A conversation was held with an IDEM, OAQ engineer who stated that Standard Register could receive credit for recycling and would have to count only the 4 wt% not recycled towards potential emissions.

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) web press (Model 88-1232) which is identified as P121. This press was installed in 1994.
 - (b) One (1) web press (Model 89-1241) which is identified as P118. This press was installed in 1990.
 - (c) One (1) web press (Model 88-1234) which is identified as P117. This press was installed in 1989.
 - (d) One (1) web press (Model 90-1255) which is identified as P140. This press was installed in 1993.
 - (e) One (1) web press (Model 390-4598) which is identified as P127. This press was installed in 1996.
 - (f) One (1) web press (Model 88-1233-D1) which is identified as P122. This press was installed in 1995.
 - (g) One (1) web press (Model 92-1228) which is identified as P123. This press was installed in 1996.
 - (h) One (1) Comco Cadet web press which is identified as P150. This press was installed in 2005.
 - (i) One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
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 - (k) One (1) seven (7) color, eighteen (18) inch Comco Press with a Hot Glue Unit, identified as P113. This press was installed in 2001.
 - (l) Two (2) five (5) color, eighteen (18) inch Comco Presses with a Hot Glue Unit each, identified as P114 and P115. These presses were installed in 2001.
 - (m) One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P#109. This press was installed in 2001.
 - (n) One (1) eight (8) color, sixteen inch Comco Press with High-Capacity Dryers, identified as P107. This press was installed in 2003.
 - (o) One (1) one (1) color, eighteen inch Comco Press with High-Capacity Dryers, identified as P145. This press was installed in 2003.
 - (p) One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #2. This unit was installed in 2003.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 8-5-5] [326 IAC 2-8-4] [326 IAC 2-1.1-5]

- (a) The source shall not exceed a total of 96 tons of VOC being fed to the emissions units combined (presses P107, P109, P113, P114, P115, P117, P118, P121, P122, P124, P123, P127, P150, P140, P145, Scitex Mobile Unit #1, Scitex Mobile Unit #2) per 12 consecutive months with compliance determined at the end of each month.
- (b) The the total VOC usage of coatings, washes, inks, additives, cleaning materials, clean up solvents, and other coatings for each emissions unit (presses P107, P109, P113, P114, P115, P117, P118, P121, P122, P123, P124, P127, P150, P140, P145, Scitex #1, Scitex #2) shall not exceed 24 tons per 12 consecutive months with compliance determined at the end of each month for each emissions unit.
- (c) Compliance with these limits renders 326 IAC 2-1.1-5, 326 IAC 2-7, and 326 IAC 8-1-6 not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The source shall not exceed 9 tons of any single HAP usage per 12 consecutive months with compliance determined at the end of each month, nor shall the source exceed 24 tons of any combination of HAPs per 12 consecutive months with compliance determined at the end of each month. Compliance with these limits renders 326 IAC 2-7 not applicable.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by tracking all VOC input (including but not limited to inks, solvents, additives, and clean-up solvents) by press. The Permittee will use manufacturer's MSDS sheets and daily record keeping to document compliance with VOC limitations. This data shall be compiled monthly and added to the previous 11 months to generate a 12-consecutive month total VOC fed to each press. IDEM, OAQ, and VCAPC, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Hazardous Air Pollutants (HAPs)

Compliance with the HAP usage limitations contained in Condition D.1.2 shall be determined by tracking HAP usage monthly. Monthly data shall be added to the previous 11 months to generate a 12-consecutive month total HAP usage.

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 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.
- (1) The VOC and HAP content (weight percentage) of each material used per press.
 - (2) The amount of each material used less water on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The volume weighted VOC and HAP content of the coatings used for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs 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 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "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

VIGO COUNTY AIR POLLUTION CONTROL

**FESOP Usage Report
 Submit Report Quarterly**

Source Name: Standard Register Company
 Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47804
 Mailing Address: 1251 North Fruitridge, Terre Haute, Indiana 47804
 FESOP No.: F167-15712-00060
 Facility: Individual Presses
 Parameter: VOC fed to individual printing presses
 Limit: 24 tons per year per press (rolled monthly)

Month: _____ Year: _____

Page 1 of 2

Press	Tons VOC this month	Tons VOC last 12 months
P107		
Month		
Month		
Month		
P109		
Month		
Month		
Month		
P113		
Month		
Month		
Month 3		
P114		
Month 1		
Month 2		
Month 3		
P115		
Month 1		
Month 2		
Month 3		
P117		
Month		
Month		
Month		
P118		
Month		
Month		
Month		
P121		
Month		
Month		
Month		

Press	Tons VOC this month	Tons VOC last 12 months
P122		
Month		
Month		
Month		
P123		
Month		
Month		
Month		
P124		
Month		
Month		
Month		
P127		
Month		
Month		
Month		
P150		
Month		
Month		
Month		
P140		
Month		
Month		
Month		
P145		
Month		
Month		
Month		
Scitex Mobile Unit #1		
Month		
Month		
Month		
Scitex Mobile Unit #2		
Month		
Month		
Month		

No deviation occurred in this month.

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

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

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Standard Register
Address City IN Zip: 1251 N. Fruitridge Ave., Terre Haute, IN 47804
Permit Number: 167-21634
Pit ID: 167-00060
Reviewer: Scott Sines
Date: 8/25/05

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
P150	300	7	13245

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Water-based Ink (WVG)	6.5	8%	100.00%	13245	3.44
Press Wash (S107)	0.05	100%	100.00%	13245	0.33
Ammonia (149)	0.2	0%	0.00%	13245	0.00

Total VOC Emissions = **3.77 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))