City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

TO: Interested Parties / Applicant

RE: Harding Poorman Group / 2nd NOC No: M 097-21779-00346

FROM: Felicia A. Robinson
Administrator

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

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

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

Enclosures

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

Certified Mail #: 7007 0220 0002 7444 2517

October 3, 2007

Mr. Robert Burger
Harding Poorman Group
4923 West 78th Street
Indianapolis, IN 46268

Re: MSOP 097-15462-00346
2nd Notice-Only-Change (NOC)
No.: M 097-21779-00346

Dear Mr. Burger:

Harding Poorman Group, formerly Harding Group d/b/a SPG Graphics, Inc., ("source") was issued a Minor Source Operating Permit (MSOP) on September 16, 2003, for its commercial printing operation located at 4923 West 78th Street, Indianapolis, IN 46268. Source applications dated March 17 and August 29, 2005 requesting Notice-Only Changes to MSOP 097-15462-00346 in regards to removing and replacement of sheetfed lithographic presses, have been combined into this NOC numbered M 097-21779-00346.

This revision is being performed pursuant to 326 IAC 2-6.1-6 (d)(13), because the modification adds emission units of the same type (nonheatset sheetfed offset lithographic presses) that are already permitted under the same applicable requirements. Before this modification, the overall source-wide Potential to Emit (PTE) of emissions was at 69.79 tons per year (tpy) for VOC, combined HAPs at 10.92 tpy, and single HAP at 6.14 tpy. After this modification, the overall source-wide VOC is being reduced to 60.36 tpy, with combined HAPs at 11.41, and single HAP at 6.60 tpy.

These changes are as noted in the enclosed Technical Support Document (TSD), and Appendix A (calculations). A copy of your revised permit is attached.

If you have any questions on this matter, please contact Carmen Bugay of my staff via e-mail at cbugay@indygov.org or phone at (317) 327-2512.

Sincerely,

Original signed by,

Felicia A. Robinson
Administrator

Enclosures: Technical Support Document (TSD) & Appendix A
Revised permit

FAR/cmb

cc: Mindy Hahn, IDEM, OAQ
Marion County Health Department
Matt Mosier, OES, Compliance
OES Files (3)

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

Minor Source Operating Permit (MSOP)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Harding Poorman Goup
4923 West 78th Street
Indianapolis, Indiana 46268

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: MSOP 097-15462-00346	
Originally signed by: John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: September 16, 2003 Expiration Date: September 16, 2008

Notice Only Change: 097-19612-00346 Issuance Date: July 29, 2004

2nd Notice-Only-Change No.: 097-21779-00346	Conditions revised: A.1, A.2, Section D.1.
Issued by, Original signed by, Felicia A. Robinson Administrator Indianapolis Office of Environmental Services	Issuance Date: October 3, 2007 Expiration Date: September 16, 2008

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary lithographic printing source.

Source Address:	4923 West 78th Street, Indianapolis, Indiana 46268
Mailing Address:	4923 West 78th Street, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 876-3355
SIC Code:	2752
County Location:	Marion
Source Location Status:	Nonattainment for 8-hour ozone standard. Nonattainment for PM 2.5 standard and Attainment for all other criteria pollutants.
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD, Emission Offset Rules and Nonattainment New Source Review Rules. Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories.

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model Speedmaster 72, 6-Color, identified as emission unit h (EU-h), with a maximum line speed of 467 feet per minute, a maximum printing width of 20 inches, constructed in 1996, and exhausting to two stacks, identified as S-01 and S-02.

(b) One (1) Ham Jet Nonheatset Sheetfed Offset Lithographic Envelope Press, model JP-TWOD-P, identified as EU-k, with a maximum line speed of 750 feet per minute (1000 envelopes per minute), and a maximum printing width of 12 inches (10 envelopes), constructed in 1996, and exhausting to general ventilation.

(c) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model GTOZ-52, identified as EU-l, with a maximum line speed of 222 feet per minute, a maximum printing width of 14 inches, constructed in 1996, and exhausting to general ventilation.

(d) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color, identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks, identified as S-03 and S-04.

(e) One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, identified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.

(f) One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(g) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(h) One (1) Kodak Digital Imaging Sheetfed Offset Lithographic Press, model KPG DI 5634, identified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(i) One (1) Heidelberg Nonheatset Sheetfed Offset UV Coating Lithographic Press, model Speedmaster SM- 72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct and operate 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.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled AMinor Source Operating Permit@, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the IDEM, OAQ, and OES.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM, OAQ and OES.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from IDEM, OAQ and OES, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees)**.**

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the IDEM, OAQ and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

and

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

(d) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP=s 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

The PMP does not require the certification by an Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

Any such application shall be certified by an Aauthorized individual@ as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee=s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 317-327-2234 (ask for OES Air Compliance), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

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 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Enforcement Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an Aauthorized individual@ as defined by 326 IAC 2-7-1(34).

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

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.4 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and OES.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14 days) prior to the actual date.

(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 the IDEM, OAQ and OES if the source submits to IDEM, OAQ and OES, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.5 Compliance Requirements [326 IAC 2-1.1-11]

The IDEM Commissioner and OES Administrator may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the IDEM Commissioner, OES Administrator or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.6 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.7 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.8 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee=s current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan), the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ and OES shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the IDEM, OAQ and OES or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to IDEM, OAQ and OES, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2)

years as long as they are available upon request. If the IDEM Commissioner and OES Administrator make a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner and OES Administrator within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

(b) 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.

(c) Unless otherwise specified in this permit, any 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 not require the certification by an AAuthorized individual@ as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Printing Press operation consisting of the following:

(a) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model Speedmaster 72, 6-Color, identified as emission unit h (EU-h), with a maximum line speed of 467 feet per minute, a maximum printing width of 20 inches, constructed in 1996, and exhausting to two stacks, identified as S-01 and S-02.

(b) One (1) Halm Jet Nonheatset Sheetfed Offset Lithographic Envelope Press, model JP-TWOD-P, identified as EU-k, with a maximum line speed of 750 feet per minute (1000 envelopes per minute), and a maximum printing width of 12 inches (10 envelopes), constructed in 1996, and exhausting to general ventilation.

(c) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model GTOZ-52, identified as EU-l, with a maximum line speed of 222 feet per minute, a maximum printing width of 14 inches, constructed in 1996, and exhausting to general ventilation.

(d) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color , identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks, identified as S-03 and S-04.

(e) One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, identified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.

(f) One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(g) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(h) One (1) Kodak Digital Imaging Sheetfed Offset Lithographic Press, model KPG DI 5634, identified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(i) One (1) Heidelberg Nonheatset Sheetfed Offset UV Coating Lithographic Press, model Speedmaster SM-72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6] [326 IAC 2-4.1]

(a) Any change or modification which will increase the potential to emit from the presses of Volatile Organic Compounds (VOC) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 8-1-6.

(b) Any change or modification which will increase the potential to emit from the presses of a single Hazardous Air Pollutant (HAP) to ten (10) tons per year or a combination of Hazardous Air Pollutants (HAP) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 2-4.1.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain records of the VOC content and the quantity of each coating material and solvent used and the HAP content and the quantity of each coating material and solvent used.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
INDIANAPOLIS OES
AIR COMPLIANCE

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Harding Poorman Goup
Address:	4923 West 78th Street
City:	Indianapolis, Indiana 46268
Phone #:	(317) 876-3355
MSOP #:	M 097-15462-00346

I hereby certify that Harding Poorman Goup is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Harding Poorman Goup is :
- ☐ in compliance with the requirements of MSOP M 097-15462-00346.
- ☐ not in compliance with the requirements of MSOP M 097-15462-00346.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
FAX NUMBER - 317 327-2274

PAGE 1 OF 2

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

_____

_____

_____

_____

_____

_____

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Harding Group dba SPG Graphics
4623 West 78th Street
Indianapolis, Indiana 46268

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for Harding Group dba SPG Graphics.
3. By virtue of my position with Harding Group dba SPG Graphics, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Harding Group dba SPG Graphics.
4. I hereby certify that ,Harding Group dba SPG Graphics has constructed the the following*:*

   (a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

   (b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 12 inches X 18 inches.

   (c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 14.38 inches X 20.5 inches.

   (d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 19 inches X 26 inches

   in conformity with the requirements and intent of the Minor Source Operating Permit(MSOP) application received by the Indianapolis Office of Environmental Services on July 25, 2003 and as permitted pursuant to **MSOP 097-15462-00346** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

_____
Signature

_____
Name (typed or printed)

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

Technical Support Document (TSD) for a Notice-Only-Change to a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Harding Poorman Group
Source Location:	4923 West 78th Street, Indianapolis, IN 46268
County:	Marion
SIC Code:	2752
Operation Permit No.:	M 097-15462-00346
2nd Notice-Only-Change No.:	M 097-21779-00346
Permit Reviewer:	Carmen Bugay

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Harding Poorman Group, formerly Harding Group d/b/a SPG Graphics, Inc., relating to the construction and operation of printing presses.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) Sheetfed Lithographic Press, identified as QMDI, with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

(b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.

(c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.

(d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.

(e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.

(f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.

(g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.

(h) One (1) Sheetfed Lithographic Press, identified as 6 Color with a maximum line speed of 467 feet per minute and a maximum printing width of twenty (20) inches, exhausting at a stack, identified as Stack 1.

(i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

(j) One (1) Web nonheatset Lithographic Press, identified as Web 6 Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.

(k) One (1) Lithographic Envelope Press, identified as Halm Jet Press, with a maximum line speed of 1000 envelopes per minute and a maximum printing width of ten (10) envelopes.

(l) One (1) Sheetfed Lithographic Press, identified as GTOZ, with a maximum line speed of 222 feet per minute and a maximum printing width of fourteen (14) inches.

(m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

Unpermitted Emission Units:

(n) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color, identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks identified as S-03 and S-04.

(o) One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, identified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.

(p) One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(q) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(r) One (1) Kodak Digital Imaging Sheetfed Offset Lithographic Press, model KPG DI 5634, identified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(s) One (1) Heidelberg Nonheatset Sheetfed Offset UV Coating Lithographic Press, model Speedmaster 72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP, M 097-15462-00346, issued on September 16, 2003;

(b) Notice-Only Change, M 097-19612-00346, issued on July 29, 2004.

All conditions from previous approvals were incorporated into this permit.

Justification for the Revision

The MSOP is being modified through a Notice-Only-Change (NOC). This revision is being performed pursuant to 326 IAC 2-6.1-6 (d)(13), because this revision adds emission units of the same type (nonheatset sheetfed offset lithographic presses) that are already permitted under the same applicable requirements. Before this revision, the overall source-wide Potential to Emit (PTE) was 69.79 tons per year (tpy) for VOC, combined HAPs 10.92 tpy, and single HAP 6.14 tpy. After this revision, the overall source-wide VOC is being reduced to 60.36 tpy, with combined HAPs at 11.41, and single HAP at 6.60 tpy.

Revision changes:

Emission Units Removed from Service:

(a) One (1) Sheetfed Lithographic Press, identified as QMDI, with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

(b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.

(c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.

(d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches. (Emission unit was not constructed.)

(e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.

(f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.

(g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.

(i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.

(j) One (1) Web nonheatset Lithographic Press, identified as Web 6-Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.

(m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches**.**

Emission Units and Pollution Control Equipment After this Revision:

(a) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model Speedmaster 72, 6-Color, identified as emission unit h (EU-h), with a maximum line speed of 467 feet per minute, a maximum printing width of 20 inches, constructed in 1996, and exhausting to stacks, identified as S-01 and S-02.

(b) One (1) Ham Jet Nonheatset Sheetfed Offset Lithographic Envelope Press, model JP-TWOD-P, identified as EU-k, with a maximum line speed of 750 feet per minute (1000 envelopes per minute), and a maximum printing width of 12 inches (10 envelopes), constructed and approved in 1996, and exhausting to general ventilation.

(c) One (1) Heidelberg Nonheatset Sheetfed Offset Lithographic Press, model GTOZ-52, identified as EU-l, with a maximum line speed of 222 feet per minute, a maximum printing width of 14 inches, constructed and approved in 1996, and exhausting to general ventilation.

(d) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color, identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks identified as S-03 and S-04.

(e) One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, identified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.

(f) One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(g) One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(h) One (1) Kodak Digital Imaging Sheetfed Offset Lithographic Press, model KPG DI 5634, identified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.

(i) One (1) Heidelberg Nonheatset Sheetfed Offset UV Coating Lithographic Press, model Speedmaster 72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.

Stack Summary

Stack ID[1]	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S-01, 02	EU-h	27	1 foot	500	70
S-03	EU-n	27	0.5 feet	125	70
S-04	EU-n	27	1 foot	500	70

Note [1]: EU-h and EU-n each exhaust to 2 vents/stacks. EU-h was previously deemed as exhausting to S-01, however it was incorrectly designated because it exhausted to two stacks. The new EU-n is utilizing the old stacks which used to be designated as S-02 and S-03 (redesignated as S-03 and S-04). All stacks have been renumbered to reflect these physical changes at the source. Any other emission units not shown in this stack summary, exhaust inside the building.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions.

Notifications for the purposes of this review were received on August 31, 2005 and April 21, 2006, with additional information received on September 13, 2005, November 1, 7, 9, 10, 15, 22, 2005, December 12, 2005; February 2, 3, 8, (site visit) 9, 2006, April 20, 2006, July 19, 2006, August 18, 24, 2006, September 21, 2006, October 12, 2006, November 9, 14, 15, December 6, 7, 14, 15, 2006; January 10, 2007, February 21, 2007, March 6, 2007, April 9, 2007, August 9, and August 10, 2007.

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

Emission Calculations

After this notice-only-change (NOC), the potential to emit (PTE) of VOC emissions show source-wide reduced numbers of 60.36 tpy, combined HAP at 11.41 tpy, and single HAP (hexane) at 6.6 tpy. MSOP 097-15462-00346 source-wide PTE of VOC emissions was 69.79 tpy, combined HAP at 10.92 tpy, and single HAP (methanol) at 6.14 tpy. See Appendix A to this TSD, pages 1-10 for detailed emissions calculations.

Potential To Emit of Source (Before Controls) After Revision

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

Pollutant	Potential To Emit (tons/year)
PM	---
PM-10	---
SO_2	---
VOC	60.36
CO	---
NO_x	C

HAP	Potential To Emit (tons/year)
Xylene	0.41
Ethylene Glycol	0.94
Glycol Ether	2.29
Hexane	6.60
Cumene	0.33
Naphthalene	0.83
TOTAL Combined	11.41

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Volatile Organic Compounds (VOC) is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	nonattainment
PM-10	attainment
SO_2	maintenance attainment
NO_x	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM-2.5 emissions, pursuant to the nonattainment New Source Review requirements. See the State Rule Applicability for the source section.

(c) Marion County has been classified as attainment or unclassifiable in Indiana for PM-10, SO_2, NOx, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emisisons
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	**--**
PM-10	--
SO_2	--
VOC	60.36
CO	--
NO_x	--
Single HAP	6.6
Combination HAPs	11.41

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

(b) This existing source is not a major stationary source under 326 IAC 2-3 (Emission Offset), because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater.

Proposed Revision

PTE from the proposed revision (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NOx (ton/yr)	HAP single (ton/yr)	HAP combined (ton/yr)
Source-wide Potential to emit (PTE) Before Revision	**--**	--	--	69.79	--	--	6.14	10.918
New Units PTE	--	--	--	41.0	--	--	3.85	7.40
Removed Presses PTE	--	--	--	50.43	--	--	negligible	6.908
Source-wide PTE After Revision	--	--	--	60.36	--	--	6.60	11.41
PSD or Offset Threshold Level	**250**	**100**	**250**	**100**	**250**	**100**	**N/A**	**N/A**

(a) This modification to an existing minor stationary source is not major because the emission increase for VOC and NOx is less than the Emission Offset major source levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

(b) This modification to an existing minor stationary source is not major because the emission increase for all other criteria pollutants is less than PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

(d) Pursuant to 326 IAC 2-6.1-6 (d)(13), this MSOP is being modified through a Notice-Only-Change (NOC), because it adds emission units of the same type that are already permitted under the same applicable requirements; and overall source-wide VOC PTE has been reduced from 69.79 tpy to 60.36 tpy.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year;

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year; and

(c) any combination of HAPs is less than 25 tons/year.

This is the third air approval issued to this source.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS) 40 CFR Part 63 (326 IAC 12):

40 CFR, ' 60.430, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing: This standard applies to each publication rotogravure printing press, that commences construction, modification or reconstruction after October 28, 1980.

The nine (9) lithographic presses (EU-h, EU-k, EU-l, EU-n, EU-o, EU-p, EU-q, EU-r, EU-t) located at the source, are not rotogravure printing presses. Therefore, this NSPS is not included.

(b) There are no NSPS (40 CFR Part 60 and 326 IAC 12) included in this revision.

(c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, ' 63.820, Subpart KK - National Emission Standards for the Printing and Publishing Industry. This standard applies to major source of hazardous air pollutants (HAP), at which publication rotogravure, product and packaging rotogravure or wideweb flexographic printing presses are operated.

The nine (9) sheetfed lithographic presses located at the source are not publication, product and packaging rotogravure printing presses, nor they are wide-web flexographic printing presses, and they are not located at a major source of HAP. Therefore, this NESHAP is not included.

(d) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, ' 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry: This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place. This source is not major for HAPs therefore, this NESHAP is not included.

(e) There are no NESHAPs (326 IAC 14, 20, and 40 CFR Part 61, 63) included in this revision.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Nonattainment New Source Review (NSR))

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM-10 (as a surrogate for PM2.5). Therefore, the nonattainment NSR requirements are not applicable.

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

This source is not one (1) of the twenty eight (28) listed source categories and has potential emissions less than 250 tons per year of regulated attainment pollutants. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (PSD).

326 IAC 2-3 (Emission Offset)

The source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), since the source does not have the potential to emit 100 tons or more per year of volatile organic compounds (VOC) or nitrogen oxides (NOx) and is located in Marion County.

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

The existing facilities are not subject to the provisions of 326 IAC 2-4.1 because they were constructed prior to the July 27, 1997 (in May 1996), the applicability date for this rule. Further, the addition of new presses (EU-n, EU-o, EU-p, EU-q, EU-r, EU-t) is also not subject to this rule because this source is not major for single or combined HAP.

326 IAC 2-6.1 (Minor Source Operating Permit)

This source is subject to the requirements to obtain a minor source operating permit (MSOP) under 326 IAC 2-6.1 because it is an existing source with a potential to emit (PTE) Volatile Organic Compounds (VOC) greater than 25 tpy and less than 100 tpy.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties. However, pursuant to 326 IAC 2-6-1(b), as a permitted source in Indiana, it is subject to 326 IAC 2-6-5 (Additional Information Requests).

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-2(2).

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

326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)

Marion County is listed under 326 IAC 6.5-1-1. However, neither the source nor its facilities are listed in 326 IAC 6.5-6-2 through 6.5-6-36, and neither have the potential to emit one hundred (100) tons per year of particulate matter (PM) or actual emissions of ten (10) tons or more of PM per year. Therefore, 326 IAC 6.5-1-1 is not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-1(b)(14), the new printing presses (EU-n, EU-o, EU-p, EU-q, EU-r, EU-t) are exempt from the requirements of 326 IAC 6-3, since they each have potential emissions less than 0.551 pounds per hour.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to all individual facilities (emission units) constructed after January 1, 1980 that have a potential to emit 25 ton/yr or more of VOC emissions and not regulated by other 326 IAC 8 provisions. There are no facilities at this source that have a potential to emit 25 ton/yr or more of VOC emissions. Therefore, this rule is not applicable.

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

This rule is not applicable to this source, since no web coating or saturation processes are utilized at this source.

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

This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing sources. The nine (9) sheetfed lithographic presses are not subject to this rule, because they are not publication, product and packaging rotogravure printing presses, nor are they flexographic printing presses.

326 IAC 8-6-1 (Organic Solvent Emissions Limitation)

This rule applies to sources existing as of January 1, 1980 in Marion County with potential VOC emissions of 100 tons per year or greater, not limited by other rules in article 8. Since the source's VOC potential emissions are below 100 tpy, this rule is not included in this permit notice-only-change.

Conclusion

The construction and operation of this permit shall be subject to the conditions of the attached revised NOC 097-21779-00346 to the MSOP 097-15462-00346.

Changes are being made to the MSOP 097-15462-00346, Section A, Section D, Table of Contents (TOC), address notifications and forms as appropriate. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows:

Change# 1:
The name of source has been changed from the Harding Group, d/b/a SPG Graphics, Inc., to the Harding Poorman Group, throughout this document. In addition, a statement in regards to Indiana Statutes and rules has been added to the cover page, to reflect applicability at the time of permit issuance.

The source name on the cover page and throughout the permit has been changed as follows:

~~Harding Group d/b/a SPG Graphics, Inc.~~ **Harding Poorman Group**

The statement added to the Cover Page is as follows:

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 MSOP under 326 IAC 2-6.1.

Change# 2:
Marion County has been classified by U.S. EPA in 70 FR 943 dated January 5, 2005, as nonattainment for the 8-hour ozone standard. Thus, NOx and VOC were reviewed based on the Emission Offset Rules. Until U.S. EPA adopts specific New Source Review (NSR) rules for PM2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM2.5 emissions, pursuant to the non-attainment NSR requirements. Therefore, the Source Status line of Condition A.1 General Information is being updated to include this status. Furthermore, IDEM and OES have changed the SIC code, General Source Phone, and have determined that is it not necessary to identify the Authorized Individual in the permit. The Authorized Individual information is being removed from Condition A.1.

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a **stationary lithographic** printing ~~press~~ **source**.

~~Authorized Individual:~~	~~President~~
Source Address:	4923 West 78th Street, Indianapolis, IN 46268
Mailing Address:	4923 West 78th Street, Indianapolis, IN 46268
General Source Phone:	(317) 876-~~3398~~ **3355**
SIC Code:	27~~31~~ **52**
County Location:	Marion
Source Location Status:	Nonattainment for 8 hour ozone **standard.**
	Nonattainment for PM-2.5 and
	Attainment for all other criteria pollutants.
Source Status:	Minor Source Operating Permit
	Minor Source, under PSD, ~~and~~ Emission Offset **and**
	Nonattainment New Source Review Rules.
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of the 28 Source Categories.

Change# 3:
Emission unit descriptions have been removed, revised, and added as appropriate to reflect changes at the source. In addition, condition D.1 has been changed to correspond with the condition shown below.

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

~~(a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.~~

~~(b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.~~

~~(c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.~~

~~(d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.~~

~~This stationary source is also approved to operate the following emissions units and pollution control devices:~~

~~(e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.~~

~~(f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.~~

~~(g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.~~

(~~h~~ **a**) One (1) **Heidelberg Nonheatset** Sheetfed **Offset** Lithographic Press, **model Speedmaster 72**, **6 Color**, identified ~~as 6-Color~~ **as emission unit h (EU-h)**, with a maximum line speed of 467 feet per minute, ~~and~~ a maximum printing width of ~~twenty (~~20~~)~~ inches, **constructed in 1996, and** exhausting ~~at a stack, identified as Stack 1~~ **to two stacks, identified as S-01 and S-02.**

~~(i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.~~

~~(j) One (1) Web nonheatset Lithographic Press, identified as Web 6 Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.~~

(~~k~~ **b**) One (1) Ham Jet **Nonheatset Sheetfed Offset** Lithographic Envelope Press, **model JP-TWOD-P, identified as EU-k,** with a maximum line speed of **750 feet per minute (**1000 envelopes per minute**)**, ~~and~~ a maximum printing width of **12 inches** ~~ten (~~10 envelopes**), constructed in 1996, and exhausting to general ventilation.**

(~~l~~ **c**) One (1) **Heidelberg Nonheatset** ~~GTOZ~~ Sheetfed **Offset** Lithographic Press, **model GTOZ-52, identified as EU-l**, with a maximum line speed of 222 feet per minute, ~~and~~ a maximum printing width of ~~fourteen (~~14~~)~~ inches**, constructed in 1996, and exhausting to general ventilation.**

~~(m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.~~

(~~n~~ **d**) **One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color , identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks, identified as S-03 and S-04.**

(~~o~~ **e**) **One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, identified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~p~~ **f**) **One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~q~~ **g**) **One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~r~~ **h**) **One (1) Kodak Digital Imaging Sheetfed Lithographic Press, model KPG DI 5634, identified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~t~~ **i**) **One (1) Heidelberg Sheetfed UV Coating Lithographic Press, model Speedmaster SM-72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.**

Change #4:
This table descriptive information has been updated to match the description in Section A, condition A.2.

SECTION D.1 FACILITY OPERATION CONDITIONS

Description [326 IAC 2-7-5(15)]: Printing Press operation consisting of the following:

~~(a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.~~

~~(b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum peed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.~~

~~(c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum peed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.~~

~~(d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.~~

~~(e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 66 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting t a stack, identified as Stack 3.~~

~~(f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 0 feet per minute and a maximum printing width of nineteen (19) inches.~~

~~(g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.~~

(~~h~~ **a**) One (1) **Heidelberg Nonheatset** Sheetfed **Offset** Lithographic Press, **model Speedmaster 72**, **6 Color**, identified ~~as 6-Color~~ **as emission unit h (EU-h)**, with a maximum line speed of 467 feet per minute, ~~and~~ a maximum printing width of ~~twenty (~~20~~)~~ inches, **constructed in 1996, and** exhausting ~~at a stack, identified as Stack 1~~ **to two stacks, identified as S-01 and S-02.**

~~(i) One (1) Sheetfed Lithographic Press, QMDI, identified as EU-i, with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches. (removed 2006)~~

~~(j) One (1) Didde Web nonheatset lithographic press, 6-Color, identified as EU-j, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.~~

(~~k~~ **b**) One (1) Ham Jet **Nonheatset Sheetfed Offset** Lithographic Envelope Press, **model JP-TWOD-P, identified as EU-k,** with a maximum line speed of **750 feet per minute (**1000 envelopes per minute**)** and a maximum printing width of **12 inches** ~~ten (~~10 envelopes**), constructed in 1996, and exhausting to general ventilation.**

(~~l~~ **c**) One (1) **Heidelberg Nonheatset** ~~GTOZ~~ Sheetfed **Offset** Lithographic Press, **model GTOZ-52, identified as EU-l**, with a maximum line speed of 222 feet per minute, ~~and~~ a maximum printing width of ~~fourteen (~~14~~)~~ inches**, constructed in 1996, and exhausting to general ventilation.**

(table continued on next page)

~~Description [326 IAC 2-7-5(15)]: Printing Press operation consisting of the following (continued):~~

~~(m) One (1) QMDI sheetfed lithographic press, identified as EU-m, with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.~~

(~~n~~ **d)** **One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-740, 7-color, identified as EU-n, with a maximum line speed of 722 feet per minute, a maximum printing width of 28 inches, constructed in April 2005, and exhausting to two stacks, identified as S-03 and S-04.**

(~~o~~ **e**) **One (1) Ryobi Nonheatset Sheetfed Offset Lithographic Press, model 3200CD, dentified as EU-o, with a maximum line speed of 200 feet per minute, a maximum printing width of 12 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~p~~ **f**) **One (1) Heidelberg Printmaster Nonheatset Sheetfed Offset Lithographic Press, model QM 46-2, 2-color, identified as EU-p, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~q~~ **g**) **One (1) Kimori Nonheatset Sheetfed Offset Lithographic Press, model Lithrone L-240, 2-color, identified as EU-q, with a maximum line speed of 236 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~r~~ **h**) **One (1) Kodak Digital Imaging Sheetfed Lithographic Press, model KPG DI 5634, dentified as EU-r, with a maximum line speed of 175 feet per minute, a maximum printing width of 13 inches, constructed in April 2005, and exhausting to general ventilation.**

(~~t~~ **i**) **One (1) Heidelberg Sheetfed UV Coating Lithographic Press, model Speedmaster SM-72, 6-color, identified as EU-t, with a maximum line speed of 299 feet per minute, a maximum printing width of 28.375 inches, constructed in August 2005, and exhausting to general ventilation.**

***

Change #5:

IDEM's mailing addresses have been changed. The following changes were made throughout the permit:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
MC 61-52 IGCN 1003
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
MC 61-53 IGCN 1003
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
MC 61-53 IGCN 1003
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Change #6:
OES's mailing addresses have been changed. The following changes were made throughout the permit:

Indianapolis Office of Environmental Services
~~Air Quality Management Section~~
~~Compliance Data Group~~
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~-2097~~

Indianapolis Office of Environmental Services
~~Air Quality Management Section~~
~~Compliance Data Group~~
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~-2097~~

Indianapolis Office of Environmental Services
~~Air Quality Management Section~~
~~Compliance Data Group~~
Enforcement Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221~~-2097~~

Change #7:
Where appropriate and to clarify notification requirements, IDEM, OAQ or IDEM Commissioner and OES or OES Administrator has been added throughout the permit. For example:

Testing Requirements

C.4 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ **and OES.**

***

Compliance Requirements [326 IAC 2-1.1-11]

C.5 Compliance Requirements [326 IAC 2-1.1-11]

The **IDEM** Commissioner **and OES Administrator** may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the **IDEM** Commissioner, **OES Administrator** or the U.S. EPA.

***

Appendix A: Emissions Calculations
VOCs and HAPs from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No : M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-h (Existing)

Throughput								
Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1,000,000	Throughput ($MMin^2$/yr) (1)
h	6-color Nonheatset Lithographic Sheet Fed (Speedmaster 72)	467	12	20	60	8,760	1,000,000	58,909

Methodology

(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage (lbs/$MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)
Ink (Handschy)	2.500	26.40%	5.00%	58,909	2,000	100.00%	0.97			2.50%				0.00	0.00	0.09	0.00	0.00
Coating (Printer's Service)	2.500	4.91%	5.00%	58,909	2,000	100.00%	0.18							0.00	0.00	0.00	0.00	0.00
Varnish (Handschy)	2.500	65.00%	5.00%	58,909	2,000	100.00%	2.39							0.00	0.00	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	58,909	2,000	100.00%	6.32	1.00%	0.00%			0.80%	2.00%	0.06	0.00	0.00	0.00	0.05
Fountain Solution	0.049	24.21%	100.00%	58,909	2,000	100.00%	0.35		10.00%	20.00%	70.00%			0.00	0.14	0.29	1.01	0.00
						TOTAL VOC	**10.22**							0.06	0.14	0.38	1.01	0.05

Notes

(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOCs and HAPs from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-k (Exisiting)

Throughput

Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) [1]
k	Halm Jet Press	750	12	12	60	8,760	1,000,000	56,765

Methodology

[1] Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage (lbs/$MMin^2$) [1]	Weight % VOC [2]	Flash Off % [3]	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time [4]	VOC Emissions (tpy) [5]	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	0.455	26.40%	5.00%	56,765	2,000	100.00%	0.17			2.50%				0.00	0.00	0.02	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	56,765	2,000	100.00%	6.09	1.00%	0.00%			0.80%	2.00%	0.06	0.00	0.00	0.00	0.05	0.12
Fountain Solution	0.049	24.21%	100.00%	56,765	2,000	100.00%	0.34		10.00%	20.00%	70.00%			0.00	0.14	0.28	0.97	0.00	0.00
						TOTAL VOC	**6.60**							0.06	0.14	0.29	0.97	0.05	0.12

Notes

[1] Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

[2] Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

[3] Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

[4] Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

[5] VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-I (Exisiting)

Throughput								
Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) (1)
I	GTOZ Nonheatset Lithographic Sheet Fed	222	12	14	60	8,760	1,000,000	19,603

Methodology
(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage ($lbs/MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	2.500	26.40%	5.00%	19,603	2,000	100.00%	0.32			2.50%				0.00	0.00	0.03	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	19,603	2,000	100.00%	2.10	1.00%	0.00%			0.80%	2.00%	0.02	0.00	0.00	0.00	0.02	0.04
Fountain Solution	0.049	24.21%	100.00%	19,603	2,000	100.00%	0.12		10.00%	20.00%	70.00%			0.00	0.05	0.10	0.34	0.00	0.00
						TOTAL VOC	**2.54**							0.02	0.05	0.13	0.34	0.02	0.04

Notes
(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers
(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses
(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.
(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology
(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-n (new)

Throughput

Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) [1]
n	Kimori L740 7-color	722	12	28	60	8,760	1,000,000	127,506

Methodology

[1] Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage (lbs/$MMin^2$) [1]	Weight % VOC [2]	Flash Off % [3]	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time [4]	VOC Emissions (tpy) [5]	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	2.500	26.40%	5.00%	127,506	2,000	100.00%	2.10			2.50%				0.00	0.00	0.20	0.00	0.00	0.00
Coating (Printer's Service)	2.500	4.91%	5.00%	127,506	2,000	100.00%	0.39							0.00	0.00	0.00	0.00	0.00	0.00
Varnish (Handschy)	2.500	65.00%	5.00%	127,506	2,000	100.00%	5.18							0.00	0.00	0.00	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	127,506	2,000	100.00%	13.68	1.00%	0.00%			0.80%	2.00%	0.14	0.00	0.00	0.00	0.11	0.27
Fountain Solution	0.049	24.21%	100.00%	127,506	2,000	100.00%	0.76		10.00%	20.00%	70.00%			0.00	0.31	0.63	2.19	0.00	0.00
						TOTAL VOC	**22.11**							0.14	0.31	0.82	2.19	0.11	0.27

Notes

[1] Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

[2] Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

[3] Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

[4] Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

[5] VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/07

EU-o (new)

Throughput								
Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) (1)
o	Ryobi 3200	200	12	12	60	8,760	1,000,000	15,137

Methodology

(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage ($lbs/MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	1.000	26.40%	5.00%	15,137	2,000	100.00%	0.10			2.50%				0.00	0.00	0.01	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	15,137	2,000	100.00%	1.62	1.00%	0.00%			0.80%	2.00%	0.02	0.00	0.00	0.00	0.01	0.03
Fountain Solution	0.049	24.21%	100.00%	15,137	2,000	100.00%	0.09		10.00%	20.00%	70.00%			0.00	0.04	0.07	0.26	0.00	0.00
						TOTAL VOC	**1.81**							0.02	0.04	0.08	0.26	0.01	0.03

Notes

(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-p (new)

Throughput

Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) [1]
p	Heidelberg Printmaster 2-color Lithographic Sheet Fed	236	12	13	60	8,760	1,000,000	19,350

Methodology

[1] Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage (lbs/$MMin^2$) [1]	Weight % VOC [2]	Flash Off % [3]	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time [4]	VOC Emissions (tpy) [5]	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	2.500	26.40%	5.00%	19,350	2,000	100.00%	0.32			2.50%				0.00	0.00	0.03	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	19,350	2,000	100.00%	2.08	1.00%	0.00%			0.80%	2.00%	0.02	0.00	0.00	0.00	0.02	0.04
Fountain Solution	0.049	24.21%	100.00%	19,350	2,000	100.00%	0.11		10.00%	20.00%	70.00%			0.00	0.05	0.09	0.33	0.00	0.00
						TOTAL VOC	**2.51**							0.02	0.05	0.13	0.33	0.02	0.04

Notes

[1] Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

[2] Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

[3] Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

[4] Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

[5] VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-15462-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-q (new)

Throughput								
Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) (1)
q	Kimori 240 2 color	236	12	13	60	8,760	1,000,000	19,350

Methodology

(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage ($lbs/MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Handschy)	2.500	26.40%	5.00%	19,350	2,000	100.00%	0.32			2.50%				0.00	0.00	0.03	0.00	0.00	0.00
Varnish (Handschy)	2.500	65.00%	5.00%	19,350	2,000	100.00%	0.79							0.00	0.00	0.00	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	19,350	2,000	100.00%	2.08	1.00%	0.00%			0.80%	2.00%	0.02	0.00	0.00	0.00	0.02	0.04
Fountain Solution	0.049	24.21%	100.00%	19,350	2,000	100.00%	0.11		10.00%	20.00%	70.00%			0.00	0.05	0.09	0.33	0.00	0.00
						TOTAL VOC	**3.30**							0.02	0.05	0.13	0.33	0.02	0.04

Notes

(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-r (new)

Throughput

Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) (1)
r	Kodak 5034	175	12	13	60	8,760	1,000,000	14,349

Methodology

(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage (lbs/$MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Toyo)	2.500	18.50%	100.00%	14,349	2,000	100.00%	3.32			0.00%				0.00	0.00	0.00	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	14,349	2,000	100.00%	1.54	1.00%	0.00%			0.80%	2.00%	0.02	0.00	0.00	0.00	0.01	0.03
Fountain Solution	0.049	24.21%	100.00%	14,349	2,000	100.00%	0.09		10.00%	20.00%	70.00%			0.00	0.04	0.07	0.25	0.00	0.00
						TOTAL VOC	**4.94**							0.02	0.04	0.07	0.25	0.01	0.03

Notes

(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers

(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses

(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology

(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOC from Printing Press Operations

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No: M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

EU-t (new)

Throughput

Emission Unit #	Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 (min/hr)	8760 (hr/yr)	1/1000000	Throughput ($MMin^2$/yr) (1)
t	720V - 6 color sheetfed lithographic	299	12	28.375	60	8,760	1,000,000	53,504

Methodology
(1) Throughput ($MMin^2$/year) = Maximum line speed feet per minute * 12 inches/ft * Maximum print width inches * 60 minutes/hour * 8760 hours/year * 1/1,000,000 conversion

PTE for VOCs

Category Name (Product with highest VOC content)	Maximum Coverage ($lbs/MMin^2$) (1)	Weight % VOC (2)	Flash Off % (3)	Throughput ($MMin^2$/yr)	2000 (lb/ton)	Maximum % Operation Time (4)	VOC Emissions (tpy) (5)	Xylene (wt%)	Ethylene Glycol (wt%)	Glycol Ethers (wt%)	Hexane (wt%)	Cumene (wt%)	Naphthalene (wt%)	Xylene (tpy)	Ethylene Glycol (tpy)	Glycol Ethers (tpy)	Hexane (tpy)	Cumene (tpy)	Naphthalene (tpy)
Ink (Toyo)	2.500	7.00%	5.00%	53,504	2,000	100.00%	0.23			0.00%				0.00	0.00	0.00	0.00	0.00	0.00
Varnish	2.500	1.00%	5.00%	53,504	2,000	100.00%	0.03							0.00	0.00	0.00	0.00	0.00	0.00
Blanket Wash	0.215	99.58%	100.00%	53,504	2,000	100.00%	5.74	1.00%	0.00%			0.80%	2.00%	0.06	0.00	0.00	0.00	0.05	0.12
Fountain Solution	0.049	24.21%	100.00%	53,504	2,000	100.00%	0.32		10.00%	20.00%	70.00%			0.00	0.13	0.26	0.92	0.00	0.00
						TOTAL VOC	**6.33**							0.06	0.13	0.26	0.92	0.05	0.12

Notes
(1) Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for these commercial printers
(2) Weight % VOC is determined from the MSDS for the "worst case" product within the appropriate category used on the identified presses
(3) Flash off % is determined from the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.
(4) Maximum % operation time assumes 100% and does not take into account the press' "make-ready" time as discussed in the EPA-453/R-06-002, September 2006, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, document.

Methodology
(5) VOC (tons per year) = Maximum Coverage x Weight % VOC x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time

Appendix A: Emissions Calculations
VOCs and HAPs from Printing Press Operations
Emission Summary

POTENTIAL EMISSIONS

Company Name: Harding Poorman Group
Address City IN Zip : 4923 West 78th Street, Indianapolis, IN 46268
MSOP : M 097-15462-00346
2nd NOC No : M 097-21779-00346
Reviewed & Verified by: Carmen Bugay, 4/23/2007

Emission Units - Potential to Emit (PTE) by pollutant

POLLUTANT	PRINTING OPERATIONS										
	Existing Presses			New Presses						TOTAL	
	EU-h	EU-k	EU-l	New EU-n	New EU-o	New EU-p	New EU-q	New EU-r	New EU-t		
	Tons/Year	Tons/Year	Tons/Year	Tons/Year	Tons/yr	Tons/yr	Tons/yr	Tons/Year	Tons/Year	Tons/Year	
VOC	10.22	6.60	2.54	22.11	1.81	2.51	3.30	4.94	6.33	**60.36**	
HAP - Xylene	0.06	0.06	0.02	0.14	0.02	0.02	0.02	0.02	0.06	0.41	
HAP - Ethylene Glycol	0.14	0.14	0.05	0.31	0.04	0.05	0.05	0.04	0.13	0.94	
HAP - Glycol Ether[1]	0.38	0.29	0.13	0.82	0.08	0.13	0.13	0.07	0.26	2.29	
HAP -Hexane	1.01	0.97	0.34	2.19	0.26	0.33	0.33	0.25	0.92	**6.60**	Highest single
HAP - Cumene	0.05	0.05	0.02	0.11	0.01	0.02	0.02	0.01	0.05	0.33	
HAP - Naphthalene	0.13	0.12	0.04	0.27	0.03	0.04	0.04	0.03	0.12	0.83	
TOTAL HAPs	1.78	1.64	0.59	3.85	0.44	0.58	0.58	0.41	1.53	**11.41**	combined
Particulates	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

	Removed Presses[2]	**New Presses**
	EU-a-g, EU-i-j, EU-m	
VOC, ton/yr	50.43	41.00
Total HAPs, ton/yr	6.908	7.40

Note 1: Manufacturer % content of Glycol ethers was not identified as being proprietory information and as such was not verified by the source, therefore it could not be taken off the HAP calculations (EPA removed off the HAP list a glycol ether from the glycol ether group with CAS No. 111-76-2 list on November 29, 2004, 69FR69320). Therefore, glycol ethers were counted in the HAP calculations.

Note 2: Removed emission units that were permitted prior to this permit revision were: EU-a, EU-b, EU-c, EU-d, EU-e, EU-f, EU-g, EU-i, EU- j, and EU-m. Emissions for unit EU-d were accounted for but the unit was never installed. EU-s is a new unit which was installed and then removed (emissions of 0.09 tpy were counted in the calculations), before this permit revision was finalized.