INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 29, 2006

RE: The Post Tribune Company / 089-22727-00506

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 03/23/06

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Mr. Jim Stephens
The Post-Tribune Company
1065 Broadway
Gary, IN 46402

March 29, 2006

Re: Exempt Construction and Operation Status,
089-22727-00506

Dear Mr. Stephens:

The application from The Post-Tribune Company, received on March 1, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary newspaper printing and publishing source, located at 1065 Broadway, Gary, IN 46402, is classified as exempt from air pollution permit requirements:

(a) three (3) natural gas-fired steam boilers, identified as Units #1, #2, and #3, each constructed in 1984, each rated at 4.0 MMBtu/hr, and each exhausting through Stack #1;

(b) one (1) offset lithographic nonheatset web printing press, constructed in 1984, consisting of 9 printing units, with maximum line speed of 1565 feet per minute and a maximum printing width of fifty (50) inches, equivalent to a maximum capacity of 50,000 newspapers per hour, exhausting inside the building;

(c) two (2) natural gas-fired hot water heaters, identified as Units #4 and #5, each constructed in 2005, each rated at 0.365 MMBtu/hr, and each exhausting through Stack #1;

(d) one (1) shielded metal arc welding (SMAW) station, constructed in 2004, with a maximum wire usage rate of 1 pound of wire per hour (SMAW Type 6011, 7018, and 6010); and

(e) two (1) oxyacetylene/electric arc flame cutting stations, constructed in 1980, each with a maximum metal thickness cut of 0.5 inches and a maximum metal cutting rate of 12 inches per minute;

The following conditions shall be applicable:

(a) 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:

(1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period unless otherwise specified in 326 IAC 6-1-10.1.

(2) 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.

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

(c) Pursuant to 326 IAC 6-2-4(a), the particulate matter emissions from the natural gas-fired steam boilers and water heaters shall each not exceed 0.6 lb/MMBtu.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

If you have any questions on this matter, please contact Nathan C. Bell, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

ncb

cc: File - Lake County
Lake County Health Department
IDEM Northwest Regional Office
Air Compliance - Rick Massoels
Permit Tracking
Compliance Data Section
Administrative and Development

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**The Post-Tribune Company**
Source Location:	**1065 Broadway, Gary, IN 46402**
County:	**Lake**
SIC Code:	**2711 (Manufacturing of Newspapers: Publishing, or Publishing and Printing)**
Application No.:	**089-22727-00506**
Reviewer:	**Nathan C. Bell**

On March 1, 2006, the Office of Air Quality (OAQ) received an application from The Post-Tribune Company relating to the construction and operation of a stationary newspaper printing and publishing source.

Unpermitted Emission Units and Pollution Control Equipment

The application includes information relating to the operation of the following unpermitted facilities:

(a) three (3) natural gas-fired steam boilers, identified as Units #1, #2, and #3, each constructed in 1984, each rated at 4.0 MMBtu/hr, and each exhausting through Stack #1;

(b) one (1) offset lithographic nonheatset web printing press, constructed in 1984, consisting of 9 printing units, with maximum line speed of 1565 feet per minute and a maximum printing width of fifty (50) inches, equivalent to a maximum capacity of 50,000 newspapers per hour, exhausting inside the building;

(c) two (2) natural gas-fired hot water heaters, identified as Units #4 and #5, each constructed in 2005, each rated at 0.365 MMBtu/hr, and each exhausting through Stack #1;

(d) one (1) shielded metal arc welding (SMAW) station, constructed in 2004, with a maximum wire usage rate of 1 pound of wire per hour (SMAW Type 6011, 7018, and 6010); and

(e) two (1) oxyacetylene/electric arc flame cutting stations, constructed in 1980, each with a maximum metal thickness cut of 0.5 inches and a maximum metal cutting rate of 12 inches per minute;

Existing Approvals

No previous air approvals have been issued to this source.

Recommendation

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

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

An application for the purposes of this review was received on March 1, 2006. Additional information was submitted by the source on March 8, 2006, March 20, 2006, and March 23, 2006.

Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 of 4).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	0.79
PM-10	1.10
SO_2	0.03
NO_x	5.58
VOC	6.80
CO	4.68

HAPs	Potential To Emit (tons/year)
Cobalt	negligible
Chromium	negligible
Manganese	negligible
Nickel	negligible
n-Hexane	0.10
Toluene	negligible
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	negligible
Lead	negligible
Cadmium	negligible
TOTAL HAPs	**0.11**

(a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

(b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	attainment
PM2.5	nonttainment
SO_2	attainment*
NO_2	unclassifiable
1-hour Ozone	severe nonattainment
8-hour Ozone	moderate nonattainment
CO	maintenance attainment
Lead	attainment

*Lake County designated as attainment for SO_2 September 26, 2005 [70 FR 56131, Amendment to 40 CFR 81.315]

(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.

(1) On January 28, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standard. Lake County has been designated as severe nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(b) Lake County has been classified as attainment in Indiana for PM-10, SO_2, 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.

(c) Lake County has been classified as nonattainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

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

Source Status

New 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	0.79
PM-10	1.10
SO_2	0.03
NO_x	5.58
VOC	6.80
CO	4.68
Worst Single HAP	0.10
Combination HAPs	0.11

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

(b) This source, located in Lake County, is not a major stationary source as defined by 326 IAC 2-3-1(aa), because VOCs are not emitted at a rate of 25 tons per year or greater, and NOx is not emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the 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 status is based on the potential to emit calculations of the source (see Appendix A).

Federal Rule Applicability

(a) Each of the printing presses at this source are not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart QQ (60.430 through 60.435), Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, since thay are not rotogravure printing presses. The printing presses at this source are lithographic printing presses.

(b) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart RR (60.440 through 60.447), Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, because this source does not contain coating lines used in the manufacture of pressure sensitive tape and label materials. This source performs commercial lithographic printing on paper.

(c) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart FFF (60.580 through 60.585), Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because this source does not contain any rotogravure printing lines used to print or coat flexible vinyl or urethane products. This source performs commercial lithographic printing on paper.

(d) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart VVV (60.740 through 60.748), Standards of Performance for Polymeric Coating of Supporting Substrates Facilities, because this source does not perform polymeric coating of supporting substrates, defined as web coating process that apply elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil (40 CFR 60.741). This source performs commercial lithographic printing on paper.

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

(f) This source is not subject to the requirements of 40 CFR Part 63, Subpart KK, NESHAPs for for Printing and Publishing Industry (63.820 through 63.831) (326 IAC 20-18-1), because this source does not contain rotogravure or wide-web flexographic printing presses and is not a major source of HAPs as defined in 40 CFR 63.2. This source contains lithographic printing presses.

(g) This source is not subject to the requirements of 40 CFR Part 63, Subpart JJJJ, NESHAPs for for Paper and Other Web Coating (63.3280 through 63.3420) (326 IAC 20-65-1), because this source is not a major source of HAPs as defined in 40 CFR 63.2.

(h) This source is not subject to the requirements of 40 CFR 63 Subpart OOOO, NESHAP for Printing, Coating, and Dyeing of Fabrics and Other Textiles (63.4280 through 63.4371) (326 IAC 20-77-1), because this source does not perform printing, coating, or dyeing of fabrics or other textiles as defined in 40 CFR 63.4371 and is not a major source of HAPs as defined in 40 CFR 63.2. This source performs commercial lithographic printing on paper.

(i) This source is not subject to the requirements of 40 CFR 63, Subpart DDDDD, NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (63.7480 through 63.7575), because the source is not a major source of HAPs.

(j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability - Entire Source

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

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1), no major modifications were done to this source, and the potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

This source, located in Lake County, which is classified as severe nonattainment for 1-hour ozone and moderate nonattainment for 8-hour ozone, is not a major source of VOCs as defined by 326 IAC 2-3-1(aa), because VOC is not emitted at a rate of 25 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source, which is located in Lake County, 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, Part 70 Permit Program, does not emit VOC or NOx into the ambient air at levels equal to or greater than 25 tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year.

326 IAC 5-1 (Opacity Limitations)

This source is located in the portion of Lake County noted in 326 IAC 5-1-1(c)(4). 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 twenty percent (20%) in any one (1) six (6) minute averaging period unless otherwise specified in 326 IAC 6-1-10.1.

(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 6-1 (Nonattainment Area Limitations)

The requirements of 326 IAC 6-1 are not applicable to this source, since the source does not have the potential to emit greater than 100 tons per year of particulate matter, or actual emissions of greater than 10 tons per year of particulate matter, is not one of the Lake County sources listed in 326 IAC 6-1-10.1 or 326 IAC 6-1-10.2 or 326 IAC 6-1-11.1(a)(2), and does not have the potential to emit greater than 5 tons per year of fugitive particulate matter into the atmosphere in Lake County.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

This source, located to Lake County, is not subject to the requirements of 326 IAC 6.8-1-2, since this source does not have the potential to emit greater than 100 tons per year of particulate matter, and does not have actual particulate matter emissions greater than 10 tons per year (326 IAC 6.8-1-1(a)).

326 IAC 6.8-2 through 326 IAC 6.8-9 (Particulate Matter Limitations for Lake County)

This source, located to Lake County, is not subject to the requirements of 326 IAC 6.8-2 through 326 IAC 6.8-9, since this source is not one of the Lake County sources listed in 326 IAC 6.8-2 through 326 IAC 6.8-9.

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)

This source, located to Lake County, is not subject to the requirements of 326 IAC 6.8-10, since this source does not have the potential to emit greater than 5 tons per year of fugitive particulate matter into the atmosphere in Lake County, and this source is not one of the Lake County sources listed in 326 IAC 6.8-10-1(a)(2).

326 IAC 6.8-11 (Lake County: Fugitive Particulate Matter Contingency Measures)

This source, located to Lake County, is not subject to the requirements of 326 IAC 6.8-11, since this source is not one of the Lake County sources listed in 326 IAC 6.8-2, is not subject to the requirements of 326 IAC 6.8-10, and does not have the potential to emit greater than 10 tons per year of PM10.

326 IAC 8-6 (Volatile Organic Compounds; Organic Solvent Emission Limitations)

The requirements of 326 IAC 8-6 are not applicable, since this source, which existed in Lake County prior to January 1, 1980, does not have the potential to emit VOCs at levels equal to or greater than one hundred (100) tons per year.

326 IAC 8-7 (Volatile Organic Compounds; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The requirements of 326 IAC 8-7 are not applicable, since this source, which is located in Lake County and does not include coating facilities, does not have the potential to emit VOCs at levels equal to or greater than twenty-five (25) tons per year.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable, since each of the emission units at this source does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

State Rule Applicability - Lithographic Printing Presses

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

Pursuant to 326 IAC 6-3-1(b)(14), the lithographic printing press is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-2-5 (Volatile Organic Compounds, Paper Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after January 1, 1980, located in any county, and with the potential to emit greater than or equal to twenty-five (25) tons of VOCs per year. The requirements of 326 IAC 8-2-5 are not applicable to the lithographic printing press, which was constructed in 1984, since it does not have the potential to emit greater than or equal to twenty-five (25) tons of VOCs per year.

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

This source, which is located in Elkhart County, includes a lithographic printing press that was constructed in 1984. The lithographic printing press is not subject to the requirements of 326 IAC 8-5-5 (Graphics Arts Operations), since it is not packaging rotogravure, publishing rotogravure, or flexographic printing press and it does not have the potential to emit greater than or equal to twenty-five (25) tons of VOCs per year.

State Rule Applicability – Natural Gas Combustion Sources

326 IAC 4-2-2 (Incinerators)

The natural gas-fired steam boilers and water heaters are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste sustances. Therefore, these units are not subject to 326 IAC 4-2-2.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired steam boilers and water heaters are subject to the requirements of 326 IAC 6-2-4, since they each are a source of indirect heating, were each installed after September 21, 1983, and are located in Lake County. Pursuant to 326 IAC 6-2-4(a), the particulate matter emissions from the natural gas-fired steam boilers and water heaters shall each not exceed 0.6 lb/MMBtu, since the total source maximum operating capacity rating is less than 10 MMBtu/hr. The natural gas-fired steam boilers each have a potential to emit particulate matter as follows:

PTE = (0.033 ton/yr PM)*(2000 lb/ton) / (8760 hr/yr)*(4.0 MMBtu/hr) = 0.002 lb/MMBtu PM

The natural gas-fired water heaters have a total potential to emit particulate matter as follows:

PTE = (0.0025 ton/yr PM)*(2000 lb/ton) / (8760 hr/yr)*(0.3 MMBtu/hr) = 0.002 lb/MMBtu PM

Therefore, the natural gas-fired steam boilers and water heaters will each comply with this rule.

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

Pursuant to 326 IAC 6-3-1(b)(1), the natural gas-fired steam boilers and water heaters are each exempt from the requirements of 326 IAC 6-3, because they each are a source of indirect heating.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired steam boilers and water heaters are each not subject to the requirements of 326 IAC 7-1, because they each have potential and actual emissions of sulfur dioxide less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

State Rule Applicability - Welding Equipment

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

(a) Pursuant to 326 IAC 6-3-1(b)(9), the shielded metal arc welding (SMAW) station is exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

(b) Pursuant to 326 IAC 6-3-1(b)(9), the oxyacetylene/electric arc flame cutting stations are each exempt from the requirements of 326 IAC 6-3, because the maximum capacity of the torch cutting is less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached exemption, No 089-22727-00506.

Appendix A: Emissions Calculations
Emission Summary

Company Name: The Post-Tribune Company
Address City IN Zip: 1065 Broadway, Gary, IN 46402
Permit Number: 089-22727
Plt ID: 089-00506
Reviewer: Nathan C. Bell
Date: March 22, 2006

	Uncontrolled Potential Emissions (tons/year)				
	Emissions Generating Activity				
Category	Pollutant	Printing Press	Welding & Flame Cutting	Natural Gas Combustion	**TOTAL**
Criteria Pollutants	PM		0.68	0.11	0.79
	PM10		0.68	0.42	1.10
	SO2			0.03	0.03
	NOx			5.58	5.58
	VOC	6.49		0.31	6.80
	CO			4.68	4.68
Hazardous Air	Cobalt		4.4E-06		4.4E-06
	Chromium		9.7E-04	7.8E-05	1.1E-03
	Manganese		6.1E-03	2.1E-05	6.1E-03
	Nickel		3.4E-04	1.2E-04	4.5E-04
	n-Hexane			0.10	0.10
	Toluene			1.9E-04	1.9E-04
	Benzene			1.2E-04	1.2E-04
	Dichlorobenzene			6.7E-05	6.7E-05
	Formaldehyde			4.2E-03	4.2E-03
	Lead			2.8E-05	2.8E-05
	Cadmium			6.1E-05	6.1E-05
	Totals	**0.00**	**7.4E-03**	**0.11**	**0.11**
				Worse Case HAP	**0.10**

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Printing Press Operations

Company Name: **The Post-Tribune Company**
Address City IN Zip: **1065 Broadway, Gary, IN 46402**
Permit Number: **089-22727**
Plt ID: **089-00506**
Reviewer: **Nathan C. Bell**
Date: **March 22, 2006**

Material	Density (lb/gal)	Maximum Usage (gal/hr)*	Maximum Usage (lbs/hr)	Maximum Usage (lbs/yr)	Weight % volatiles less water and non-VOCs	Percent Flash Off	PTE VOC (tons/yr)
Flink Ink: Arrowlith Dense Black Ink	8.65	99	856.35	7501626	2.77%	5.0%	5.20
Ultimate Solvent Alternative (USA) Blanket/Roller Wash	6.92	0	0.53	4632	55.60%	100.0%	1.29
Fountain Solution	9.41	0.188	1.76	15452	0%	100%	0.00
						TOTALS	**6.49**

METHODOLOGY

*Maximum ink usage provided by source, based on maximum capacity of 50,000 newspapers per hour with 9 printing units operating, 11 gallons/hr per printin
*Maximum blanket/roller wash usage based on maximum usage of 55 gallons/month. Maximum fountain solution usage based on 4.5 gallons/day.
Maximum Usage (lbs/hr) = [Density (lb/gal)]*[Maximum Usage (gal/hr)]
Maximum Usage (lbs/yr) = [Maximum Usage (lbs/hr)]*[8760 hrs/yr]
PTE of VOCs (tons/yr) = [Maximum Usage (lbs/yr)]*[Weight % volatiles less water]*[% Flash Off]*[ton/2000 lbs]
Percent Flash Off information from OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93)

Appendix A: Emissions Calculations
Welding and Flame Cutting Operation

Company Name: The Post-Tribune Company
Address City IN Zip: 1065 Broadway, Gary, IN 46402
Permit Number: 089-22727
Plt ID: 089-00506
Reviewer: Nathan C. Bell
Date: March 22, 2006

Particulate Matter (PM) and Hazardous Air Pollutants (HAPs)

PROCESS	Number of	Max. electrode consumption per	Max. electrode consumption per	Max. electrode consumption	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING	Stations	station (lbs/hr)	station (lbs/day)	(lbs/year)	PM = PM10	Cr	Co	Mn	Ni	PM = PM10	Cr	Co	Mn	Ni	
Shielded Metal Arc Welding (E6010)	1	1.00	24.0	8,760	2.56E-02	3.0E-06		9.91E-04	4.0E-06	0.03	3.0E-06	0.0E+00	9.9E-04	4.0E-06	1.0E-03
Shielded Metal Arc Welding (E6011)	1	1.00	24.0	8,760	3.84E-02	5.0E-06	1.0E-06	9.98E-04	5.0E-06	0.04	5.0E-06	1.0E-06	1.0E-03	5.0E-06	1.0E-03
Shielded Metal Arc Welding (E7018)	1	1.00	24.0	8,760	1.84E-02	6.0E-06	1.0E-06	1.03E-03	2.0E-06	0.02	6.0E-06	1.0E-06	1.0E-03	2.0E-06	1.0E-03
Maximum Worst Case Welding	**1**	**1.00**	**24.0**	**8,760**						**0.04**	**6.0E-06**	**1.0E-06**	**1.0E-03**	**5.0E-06**	**1.0E-03**

PROCESS	Number of	Max. Metal Thickness	Max. Metal Cutting Rate	Max. Metal Cutting Rate	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING	Stations	Cut (in)	(in/minute)	(in/hour)	PM = PM10	Cr	Co	Mn	Ni	PM = PM10	Cr	Co	Mn	Ni	
Oxyacetylene/Electric Arc	2	0.50	12.00	720	1.6E-01	3.0E-04		5.0E-04	1.0E-04	0.12	2.2E-04		3.6E-04	7.2E-05	0.00

Abbreviations
Cr = Chromium
Co = Cobalt
Mn = Manganese
Ni = Nickel

Total Potential Emissions lbs/hr	0.16	2.2E-04	1.0E-06	1.4E-03	7.7E-05	0.00
Total Potential Emissions lbs/day	3.72	0.01	2.4E-05	0.03	0.00	0.04
Total Potential Emissions tons/year	0.68	0.00	4.4E-06	0.01	3.4E-04	0.01

METHODOLOGY
Welding emissions, lb/hr: (# of stations) * (max. lbs of electrode used/hr/station) * (emission factor, lb. pollutant/lb. of electrode used)
Cutting emissions, lb/hr: (# of stations) * (max. metal thickness, in.) * (max. cutting rate, in./min.) * (60 min./hr.) * (emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: The Post-Tribune Company
Address City IN Zip: 1065 Broadway, Gary, IN 46402
Permit Number: 089-22727
Plt ID: 089-00506
Reviewer: Nathan C. Bell
Date: March 22, 2006

			Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO
			Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10*	SO2	NOx**	VOC	CO
Steam Boilers #1, #2, and #3	3	4.000	12.0	105.12	0.100	0.399	0.032	5.256	0.289	4.415
Hot Water Heaters #4 and #5	2	0.365	0.73	6.39	6.1E-03	0.024	0.002	0.320	0.018	0.269
Totals	**5**		**12.7**		**0.106**	**0.424**	**0.033**	**5.576**	**0.307**	**4.684**

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Potential Emission tons/yr									
Emission Unit	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Steam Boilers #1, #2, and #3	1.1E-04	6.3E-05	3.9E-03	0.095	1.8E-04	2.6E-05	5.8E-05	7.4E-05	2.0E-05	1.1E-04
Hot Water Heaters #4 and #5	6.7E-06	3.8E-06	2.4E-04	0.006	1.1E-05	1.6E-06	3.5E-06	4.5E-06	1.2E-06	6.7E-06
Totals	**1.2E-04**	**6.7E-05**	**4.2E-03**	**0.100**	**1.9E-04**	**2.8E-05**	**6.1E-05**	**7.8E-05**	**2.1E-05**	**1.2E-04**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology
Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2,000 lb/ton
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter	NOx = Nitrous Oxides	DCB = Dichlorobenzene	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC - Volatile Organic Compounds	Pb = Lead	Mn = Manganese
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium	Ni = Nickel