INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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: August 1, 2007

RE: EP Graphics, Inc. / 001-23138-00039

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of 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.dot 03/23/06

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

EP Graphics, Inc.
169 South Jefferson Street
Berne, Indiana 46711

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: 001-23138-00039	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2007 Expiration Date: August 1, 2012

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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). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary commercial lithographic printing facility.

Source Address:	169 South Jefferson Street, Berne, Indiana 46711
Mailing Address:	169 South Jefferson Street, Berne, Indiana 46711
General Source Phone Number:	(260) 589 2145
SIC Code:	2752
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset 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 [326 IAC 2-8-3(c)(3)]

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

(a) One (1) web fed heatset lithographic press (identified as press 67), constructed in 2001, with a maximum capacity of 32.76 million square inches per hour, exhausting to the regenerative thermal oxidizer (identified as RTO-1).

(b) One (1) web fed heatset lithographic press (identified as press 66), constructed in 1996, with a maximum capacity of 62.20 million square inches per hour, exhausting to the regenerative thermal oxidizer (identified as RTO-1).

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

This stationary source also includes the following insignificant activities:

(a) One (1) web fed lithographic press (identified as press 56), with a maximum capacity of 15.55 million square inches per hour.

(b) One (1) web fed lithographic press (identified as press 57), with a maximum capacity of 18.14 million square inches per hour.

(c) One (1) ink jet printing process, constructed in 2005, consisting of seven (7) ink jet units, with a maximum capacity of 0.64 gallons of ink per day.

(d) One (1) bindery machine, constructed in 1996, equipped with a cyclone in series with a baghouse for dust control (identified as DC1) with a maximum capacity of 1,212 pounds of paper hour.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of the following units:

(1) Eight (8) natural gas-fired forced air heaters, each with a maximum capacity of 0.150 MMBtu per hour.

(2) Six (6) natural gas-fired forced air heaters, each with a maximum capacity of 0.225 MMBtu per hour.

(3) Fifteen (15) natural gas-fired forced air heaters, each with a maximum capacity of 0.120 MMBtu per hour.

(4) Two (2) natural gas-fired forced air heaters, each with a maximum capacity of 0.30 MMBtu per hour.

(5) Two (2) natural gas-fired forced air heaters, each with maximum capacity of 0.20 MMBtu per hour.

(6) One (1) natural gas-fired forced air heater, with a maximum capacity of 0.080 MMBtu per hour.

(7) Two (2) natural gas-fired dryers, each with a maximum heat input capacity of 4.0 MMBtu per hour.

(f) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 FESOP Applicability [326 IAC 2-8-2] [326 IAC 6-4]

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F001-23138-00039, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 001-23138-00039 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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 on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may

open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control

requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee

may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

Any monitoring or testing 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) web fed heatset lithographic press (identified as press 67), constructed in 2001, with a maximum capacity of 32.76 million square inches per hour, and using a regenerative thermal oxidizer (identified as RTO-1) for VOC emissions control.

(b) One (1) web fed heatset lithographic press (identified as press 66), constructed in 1996, with a maximum capacity of 62.20 million square inches per hour, and using a regenerative thermal oxidizer (identified as RTO-1) for VOC emissions control.

Insignificant Activities:

(a) One (1) web fed lithographic press (identified as press 56), with a maximum capacity of 15.55 million square inches per hour.

(b) One (1) web fed lithographic press (identified as press 57), with a maximum capacity of 18.14 million square inches per hour.

(c) One (1) ink jet printing process, constructed in 2005, consisting of seven (7) ink jet units, with a maximum capacity of 0.64 gallons of ink per day.

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

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

D.1.1 VOC and HAP Limitations [326 IAC 2-8]

Pursuant to F001-14103-00039, issued March 6, 2002, and in order to limit the source to less than major source threshold levels for HAPs and VOC:

The VOC emissions from the printing operation (consisting of presses 66 and 67) shall be limited to 81.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Volatile Organic Compound (VOC) BACT Limitations [326 IAC 8-1-6]

Pursuant to F001-14103-00039, issued March 6, 2002 and provisions of 326 IAC 8-1-6 (BACT), the Permittee shall continue to apply the following Best Available Control Technology (BACT) for printing presses (identified as press 66 and press 67):

(a) The regenerative thermal oxidizer (identified as RTO-1) shall control the VOC emissions from the printing operation (identified as press 66 and press 67) at all times when the printing presses 66 and 67 are in operation.

(b) The press dryers used in conjunction with each printing press (identified as press 66 and press 67) shall operate at a negative air flow pressure (relative to the surrounding room). Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control device.

Compliance Determination Requirements

D.1.4 VOC Control

To demonstrate compliance with Condition D.1.1, VOC emissions from presses 66 and 67, shall be determined after the effect of the regenerative thermal oxidizer (identified as RTO-1). To determine the VOC input in the regenerative thermal oxidizer, the Permittee shall use a VOC retention factor of 20% for the heatset inks. The capture efficiency shall comply with the following:

(a) One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and

(b) Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

The destruction efficiency of the regenerative thermal oxidizer shall be at least 90%.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within five (5) years of the last compliant stack test, the Permittee shall perform a compliance stack test to verify VOC control efficiency for the regenerative thermal oxidizer (identified as RTO-1), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.6 Thermal Oxidizer Temperature [326 IAC 8-1-6]

(a) The regenerative thermal oxidizer shall maintain a minimum operating temperature of 1400°F or the temperature as determined during the latest compliant stack test. The minimum operating temperature shall achieve a destruction efficiency of at least 90%.

(b) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring the operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400^{o}F.

(c) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.2, as approved by IDEM, OAQ.

(d) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.7 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.2, as approved by IDEM, OAQ.

(b) The duct pressure shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure shall be maintained within the normal range as established in most recent compliant stack test.

D.1.8 Negative Air Flow Pressure for Thermal Oxidizers

Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies for presses 66 and 67:

(a) One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and

(b) Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage; and

(4) The total VOC usage for each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Condition D.1.2.

(1) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Daily records of the duct pressure or fan amperage across the dryer inlets and outlets. The records shall be kept using differential pressure gauges with one inlet of each gauge being within the dryer and the other inlet of the gauge being open to the ambient air in the press room.

(3) Records of the VOC destruction efficiency and a description of the data used to establish the capture and destruction efficiencies.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: EP Graphics, Inc.
Source Address: 169 South Jefferson Street, Berne, Indiana 46711
Mailing Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Permit No.: 001-23138-00039

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: EP Graphics, Inc.
Source Address: 169 South Jefferson Street, Berne, Indiana 46711
Mailing Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Permit No.: 001-23138-00039

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EP Graphics, Inc.
Source Address: 169 South Jefferson Street, Berne, Indiana 46711
Mailing Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Permit No.: 001-23138-00039
Facility: Lithographic Printing Presses 66 and 67 and associated cleanup operations
Parameter: Volatile Organic Compounds (VOCs) Emissions
Limit: 81.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: EP Graphics, Inc.
Source Address: 169 South Jefferson Street, Berne, Indiana 46711
Mailing Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Permit No.: 001-23138-00039

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:______________________________

Title / Position:__________________________________

Date:____

Phone: _______________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	EP Graphics, Inc.
Source Location:	169 South Jefferson Street, Berne, Indiana 46711
County:	Adams
SIC Code:	2752
Operating Permit No.:	F001-14103-00039
Operating Permit Issuance Date:	March 6, 2002
Permit Renewal No.:	F001-23138-00039
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from EP Graphics, Inc. relating to the operation of a stationary commercial lithographic printing facility.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) web fed heatset lithographic press (identified as press 67), constructed in 2001, with a maximum capacity of 32.76 million square inches per hour, and using a regenerative thermal oxidizer (identified as RTO-1) for VOC emissions control.

(b) One (1) web fed heatset lithographic press (identified as press 66), constructed in 1996, with a maximum capacity of 62.20 million square inches per hour, and using a regenerative thermal oxidizer (identified as RTO-1) for VOC emissions control.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units requiring prior approval at this time.

Insignificant Activities

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

(a) One (1) web fed lithographic press (identified as press 56), with a maximum capacity of 15.55 million square inches per hour.

(b) One (1) web fed lithographic press (identified as press 57), with a maximum capacity of 18.14 million square inches per hour.

(c) One (1) ink jet printing process, constructed in 2005, consisting of seven (7) ink jet units, with a maximum capacity of 0.64 gallons of ink per day.

(d) One (1) bindery machine, constructed in 1996, equipped with a cyclone in series with a baghouse for dust control (identified as DC1) with a maximum capacity of 1,212 pounds of paper per hour.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of the following units:

(1) Eight (8) natural gas-fired forced air heaters, each with a maximum capacity of 0.150 MMBtu per hour.

(2) Six (6) natural gas-fired forced air heaters, each with a maximum capacity of 0.225 MMBtu per hour.

(3) Fifteen (15) natural gas-fired forced air heaters, each with a maximum capacity of 0.120 MMBtu per hour.

(4) Two (2) natural gas-fired forced air heaters, each with a maximum capacity of 0.30 MMBtu per hour.

(5) Two (2) natural gas-fired forced air heaters, each with maximum capacity of 0.20 MMBtu per hour.

(6) One (1) natural gas-fired forced air heater, with a maximum capacity of 0.080 MBtu per hour.

(7) Two (2) natural gas-fired dryers, each with a maximum heat input capacity of 4.0 MMBtu per hour.

(f) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

Existing Approvals

The source has been operating under the previous FESOP Renewal No. 001-14103-00039 issued on March 6, 2002, with an expiration date of March 6, 2007, and the following amendments:

(a) First Administrative Amendment No. 001-19592-00039, issued on August 10, 2004.

(b) Second Administrative Amendment No. 001-21278-00039, issued on June 16, 2005.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

FESOP No.: 001-14103-00039, issued March 6, 2002

Condition D.1.3: Pursuant to 326 IAC 2-8-4 (FESOP), the hazardous air pollutant emissions shall be limited as follows:

(a) The amount of any single hazardous air pollutant (HAP) input to the printing operation and associated cleanup activities shall be limited to less than 10 tons per twelve (12) consecutive months.

(b) The amount of any combination of HAPs input to the printing operation and associated cleanup activities shall be limited to less than 25 tons per twelve (12) consecutive months.

(c) For presses 62, 66, and 67, there is a regenerative thermal oxidizer for control. For these three (3) presses, the HAP input may be determined after the effect of the control device. To determine the HAP input, the source shall be allowed a HAP retention factor of 20% for the heatset inks.

Reason not incorporated:
The Permittee was issued a FESOP No.: 001-14103-00039, on March 6, 2002, which limited the potential to emit of each single HAP to less than ten (10) and combination of HAPs to less than twenty-five (25) tons per year pursuant to the provisions of 326 IAC 2-8. On November 29, 2004, ethylene glycol monobutyl ether (EGBE, 2-Butoxyethanol), CAS Number 111–76–2 was deleted from the list of hazardous air pollutants (HAP) established by 42 U.S.C. 7412(b)(1) (see 69 FR 69325, November 29, 2004). 326 IAC 1-2-33.5 was revised effective November 20, 2005 to incorporate these amendments to 40 CFR 63, Subpart C. Most of the HAPs used at the source were EGBE, therefore, the revised potential to emit from the entire source is equal to 8.62 tons of single highest HAP per year, and 8.77 tons of a combination of HAPs per year.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on May 26, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 11).

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	0.16
PM10	0.48
SO_2	0.03
VOC	148
CO	4.81
NO_x	5.73

HAPs	Unrestricted Potential Emissions (tons/year)
Benzene	1.20E-04
Dichlorobenzene	6.87E-05
Formaldehyde	4.30E-03
Hexane	1.03E-01
Toluene	1.95E-04
Glycol Ether	8.62
Styrene	0.02
Vinyl Acetate	0.02
Total	8.77

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/Emission Unit	PM	PM10	SO_2	VOC	CO	NO_x	HAPs
Printing Operations (Press 56 and 57)	0.0	0.0	0.0	7.58	0.0	0.0	8.77
Printing Operations (Press 66 and 67)	0.0	0.0	0.0	81.6	0.0	0.0	
Ink Jet Printing Process	0.0	0.0	0.0	0.76	0.0	0.0	
Bindery Machine	0.05	0.05	0.0	0.0	0.0	0.0	0.0
Natural Gas-fired Combustion Units	0.11	0.43	0.03	0.32	4.81	5.73	1.08E-01
Total Emissions	0.16	0.48	0.03	<100	4.81	5.73	8.77

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: 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.

(a) Adams County has been classified as unclassifiable or attainment 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 a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides 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 ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.16
PM10	0.48
SO_2	0.03
VOC*	<100
CO	4.81
NO_x	5.73
Single HAP	<10
Combination HAPs	<25

* Limited pursuant to 326 IAC 2-8 (FESOP)

(a) This existing source is not a major stationary source under 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 not a major source because no single HAP or combination of HAPs is emitted at a rate of 10 and 25 tons per year or greater, respectively.

Federal Rule Applicability

(a) The provisions of 40 CFR 60, Subpart QQ - Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing (326 IAC 12) are not included in the permit for this source because the Permittee does not use rotogravure printing presses.

(b) The provisions of 40 CFR 60, Subpart Kb – New Source Performance Standards for Volatile Organic Liquid Storage Vessels (included Petroleum Liquid Storage Vessels) for which Construction, Reconstruction or Modification Commenced After July 23, 1984 are not included in this permit for the storage tanks. Although constructed after July 23, 1984 the storage capacities of the tanks are less than 75 cubic meters (19,813 gallons).

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

(c) The provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 20-18) are not included in the permit for this source because this source has limited its hazardous air pollutant (HAP) emissions pursuant to the provisions of 326 IAC 2-8, and is therefore a minor source of HAPs.

(d) The provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 20-65) are not included in the permit for this source because this source has limited its HAP emissions pursuant to the provisions of 326 IAC 2-8, and is therefore a minor source of HAPs.

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

State Rule Applicability – Entire Source

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

This source is not in 1 of the 28 source categories and the potential to emit of each criteria pollutant before controls is less than 250 tons per year. This source has been operating under the provisions of 326 IAC 2-8 (FESOP) since 1996 when it was issued a FESOP no.: F001-5957-

00039 on December 11, 1996. A FESOP Renewal No.: F001-14103-00039 was issued to the source on March 6, 2002 with an expiration date of March 6, 2007.

On May 26, 2006, the Permittee submitted an application to IDEM, OAQ requesting to continue to operate their existing commercial lithographic printing facility under the provisions of 326 IAC 2-8 (FESOP), which limits potential to emit of each criteria pollutant to less than major source threshold levels (less than 100 tons per year). Therefore, the provisions of 326 IAC 2-2 (PSD) do not apply.

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

The potential to emit of any single HAP and combination of HAPs from the operation of this stationary commercial lithographic printing facility is limited to less than ten (10) and less than twenty-five (25) tons per year, respectively. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to the periodic reporting requirements of 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 program). The potential to emit of lead (Pb) is less than 5 tons per year and it is not located Lake, LaPorte or Porter County. However, pursuant to 326 IAC 2-6-1(b) it is subject to the additional information requests in 326 IAC 2-6-5.

326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

Pursuant to F001-14103-00039, issued March 6, 2002 and 326 IAC 2-8 (FESOP), and in order to limit the source to less than major source threshold levels for VOC:

(a) The VOC emissions from the printing operation (consisting of presses 66 and 67) shall be limited to 81.6 tons per twelve (12) consecutive month period. This limit is based on a VOC retention factor of 20% for heatset inks used in presses 66 and 67, and will limit VOC emissions to less than 81.6 tons per twelve (12) consecutive month period.

(b) For presses 66 and 67, using a regenerative thermal oxidizer (identified as RTO-1) for VOC control, the VOC emissions shall be determined after the effect of the regenerative thermal oxidizer. To determine the VOC input to the regenerative thermal oxidizer, the Permittee shall be allowed a VOC retention factor of 20% for the heatset inks. The capture efficiency shall comply with the following:

(1) One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and

(2) Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

The destruction efficiency of the regenerative thermal oxidizer shall be at least 90%.

Compliance with these limits makes the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

The provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) do not apply to this source because this source did not commence its operation after October 7, 1974 and prior to January 1, 1980. This source was constructed after 1980.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.

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

The provisions of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) do not apply to this source because the source is located in Adams County.

State Rule Applicability – Bindery Machine

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

The particulate emission rate from the bindery machine before control is less than 0.551 pound per hour (see Page 3 of 10 TSD, Appendix A). Therefore, this unit is exempt from the provisions of 326 IAC 6-3-2. [326 IAC 6-3-2(b)(14)]

State Rule Applicability - Printing Presses 66 and 67

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The potential VOC emissions from printing presses 66 and 67 are greater than twenty-five (25) tons per year. Therefore, it is subject to the provisions of 326 IAC 8-1-6. Pursuant to F001-14103-00039, issued March 6, 2002 and provisions of 326 IAC 8-1-6 (BACT), the Permittee shall continue to apply the following Best Available Control Technology (BACT) for printing presses (identified as press 66 and press 67):

(a) The regenerative thermal oxidizer (identified as RTO-1) shall control the VOC emissions from the printing operation (identified as press 66 and press 67) at all times when the printing presses 66 and 67 are in operation.

(b) The press dryers used in conjunction with each printing press (identified as press 66 and press 67) shall operate at a negative air flow pressure (relative to the surrounding room). Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.

(c) Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies for presses 66 and 67:

(1) One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and

(2) Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

(d) The regenerative thermal oxidizer shall maintain a minimum operating temperature of 1400^{o}F or the temperature as determined during the latest compliant stack test. The minimum operating temperature shall achieve a destruction efficiency of at least 90%.

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

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to this source because the rule pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses. The printing presses at the source are all lithographic printing presses.

State Rule Applicability - Printing Presses 56 and 57

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The requirements of 326 IAC 8-1-6 are not applicable to the two printing presses (identified as press 56 and 57) because the potential VOC emissions from each press is less than twenty-five (25) tons per year.

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

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the printing presses (identified as press 56 and 57) because this rule pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses. Presses 56 and 57 are lithographic printing presses.

State Rule Applicability - Ink Jet Printing Process

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The requirements of 326 IAC 8-1-6 are not applicable to the one (1) ink jet printing process consisting of seven (7) ink jet units because the potential VOC emissions from these units are less than twenty-five (25) tons per year.

State Rule Applicability - Storage Tanks

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

The source is not located in Lake, Porter, Clark or Floyd counties. Therefore, the requirements of 326 IAC 8-9-1 do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The storage tanks are not subject to the provisions of 326 IAC 8-1-6 because, although constructed after January 1, 1980, the applicability date for this rule, the potential VOC emissions from the storage tanks at this source are less than twenty-five (25) tons per year.

State Rule Applicability – Natural Gas-Fired Combustion Units

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

Testing Requirements

Within five (5) years of the last compliant stack test, the Permittee shall perform a compliance stack test to verify VOC control efficiency for the regenerative thermal oxidizer (identified as RTO-1), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

(a) The regenerative thermal oxidizer (identified as RTO-1) for VOC control from printing presses 66 and 67, has applicable compliance monitoring conditions as specified below:

Thermal Oxidizer Temperature

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400^{o}F.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test.

(3) On and after the date the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

Parametric Monitoring

(4) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in BACT, as approved by IDEM, OAQ.

(5) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

These compliance monitoring requirements are necessary to ensure compliance with the provisions of 326 IAC 8-1-6 (BACT) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this stationary commercial lithographic printing facility shall be subject to the conditions of the FESOP Renewal No. 001-23138-00039.

Appendix A: Emission Calculations
Natural Gas-Fired Units

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMSCF/year)
13	115

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.5	84.0
Potential To Emit (tons/year)	0.11	0.44	0.03	5.73	0.32	4.81

* PM emission factor is filterable PM only; and PM10 emission factor is filterable and condensable PM combined.
**Emission factor for NOx: Uncontrolled = 100 lb/MMSCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs
See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas-Fired Units

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.20E-04	6.87E-05	4.30E-03	1.03E-01	1.95E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	2.86E-05	6.30E-05	8.02E-05	2.18E-05	1.20E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations
Particulate Emissions From the Bindery Machine

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Material	Outlet Grain Loading (gr/acf)	Control Efficiency (%)	Air Flow (acfm)	PTE of PM/PM10 After Controls (tons/year)	PTE of PM Before Controls (tons/year)
Paper	3.00E-05	99.9%	43.7	4.92E-05	0.049

* Assume all PM emissions are equal to PM10.

METHODOLOGY:
PTE After controls (tons/year) = Outlet Grain Loading (gr/acf) * Air Flow Rate (acfm) * 60 minutes/hour * 1 lb/ 7000gr * 8760 hours/year * 1 ton/2000 lbs
PTE Before Controls (tons/year) = PTE After Controls (tons/year) *1/ (1- Control Efficiency %)

Appendix A: Emissions Calculations
VOC From Printing Press #67 - Before Controls

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin^2/Year)
King Process Color Press #67	1,264	36.0	286,978

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
H/S All Purpose Black (C-71470)	0.48	31.5%	80.0%	17.3
H/S All Purpose Blue (C-71471)	0.35	36.2%	80.0%	14.5
H/S All Purpose Yellow (C-71473)	0.37	30.3%	80.0%	12.9
* Fountain Solution Unigraphic 6M	0.32	10.9%	100%	4.93
Gloss Aqueous Acrylic Emulsion (CK-1051)	0.34	4.00%	80.0%	1.56
H/S All Purpose Red (C-71472)	0.33	32.4%	80.0%	12.5
			Total	**63.6**

* Contains HAPs.

METHODOLOGY
Max. Throughput ($MMin^2$/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE of VOC (tons/year) = Maximum coverage (lbs/$MMin^2$) * Weight % volatiles * Flash off % * Max. throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
HAPs From Printing Press #67 - Before Controls

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin^2/Year)
King Process Color Press #67	1,264	36.0	286,978

Ink	Maxium Coverage (lbs/MMin^2)	* Weight % HAP	Flash Off %	PTE of HAP (tons/year)
Fountain Solution Unigraphic 6M	0.32	14.0%	100%	6.34
			Total	**6.34**

* Glycol Ether

METHODOLOGY
Max. Throughput ($MMin^2$/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE of VOC (tons/year) = Maximum coverage (lbs/$MMin^2$) * Weight % volatiles * Flash off % * Max. throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press #66 - Before Controls

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin^2/Year)
Lithographic Printing Press #66	2,400	36.0	544,942

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
HS/WO Gloss Yellow **	0.75	45.0%	80.0%	73.6
			Total	**73.6**

** Contains no HAPs.

METHODOLOGY
Max. Throughput ($MMin^2$/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE of VOC (tons/year) = Maximum coverage (lbs/$MMin^2$) * Weight % volatiles * Flash off % * Max. throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press #56 - Before Controls

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin^2/Year)
Lithographic Printing Press #56	600	36.0	136,236

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
Fast Set Black**	0.75	9.00%	100%	4.60
			Total	**4.60**

** Contains no HAPs.

METHODOLOGY
Max. Throughput ($MMin^2$/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE of VOC (tons/year) = Maximum coverage (lbs/$MMin^2$) * Weight % volatiles * Flash off % * Max. throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press #57 - Before Controls

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin^2/Year)
Lithographic Printing Press #57	700	36.0	158,941

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
Low Rub Black**	0.75	5.00%	100%	2.98
			Total	**2.98**

** Contains no HAPs.

METHODOLOGY
Max. Throughput ($MMin^2$/year) = Maximum line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE of VOC (tons/year) = Maximum coverage (lbs/$MMin^2$) * Weight % volatiles * Flash off % * Max. throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations
HAP Emissions From Solvent Usage

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % Glycol Ethers	Weight % Styrene	Weight % Vinyl Acetate	PTE of Glycol Ethers (tons/year)	PTE of Styrene (tons/year)	PTE of Vinyl Acetate (tons/year)
Solvents									
ARS-F	7.80	0.24	1.00	0.0%	0.0%	0.0%	0.00	0.0	0.0
Emerald PFH	8.90	0.24	1.00	7.78%	0.0%	0.0%	0.73	0.0	0.0
Aqua Magic	8.80	0.18	1.00	0.0%	0.0%	0.0%	0.0	0.0	0.0
Ovemite	8.33	0.01	1.00	4.00%	0.0%	0.0%	0.009	0.0	0.0
Take it off	7.50	0.01	1.00	5.00%	0.0%	0.0%	0.018	0.0	0.0
Acrylic Emulsion	8.58	0.28	1.00	0.0%	0.0%	0.0%	0.0	0.0	0.0
Fountain Solution	8.93	0.57	1.00	0.0%	0.0%	0.0%	0.0	0.0	0.0
Agloss Overcoat	8.60	1.24	1.00	0.0%	0.05%	0.0%	0.00	0.023	0.0
Colorkleen	6.91	0.34	1.00	15.0%	0.0%	0.0%	1.52	0.0	0.0
Hot Melt Adhesive	7.50	0.64	1.00	0.0%	0.0%	0.10%	0.0	0.0	0.02
						Total Individual HAPs (tons/year) =	**2.28**	**0.02**	**0.02**
						Total Combination HAPs (tons/year) =	**2.33**		

METHODOLOGY

PTE of HAPs (tons/year) = Density (lbs/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Seven Ink Jet Printers

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % VOC	PTE of VOC (tons/year)
Make up	6.67	0.02	1.00	100%	0.704
Ink	7.17	0.002	1.00	83.0%	0.052
					0.76

METHODOLOGY
PTE of VOC (tons/year) = Density (lbs/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * Weight % VOC * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Summary

Company Name: EP Graphics, Inc.
Address: 169 South Jefferson Street, Berne, Indiana 46711
FESOP Renewal: 001-23138-00039
Plt ID: 001-00039
Reviewer: ERG/SD
Date: April 30, 2007

Uncontrolled PTE in tons per year

Emission Unit/Process Unit	PM	PM10	SO_2	NOx	VOC	CO	Combined HAPs
Natural Gas-Fired Combustion Units	0.11	0.44	0.03	5.73	0.32	4.81	0.11
Bindery Machine	0.049	0.049					
King Process Color Press #67					63.6		6.34
Lithographic Printing Press #66					73.6		0
Lithographic Press #56					4.60		0
Lithographic Press #57					2.98		0
Solvent Usage (Cleaning)					2.33		2.33
Seven Ink Jet Printers					0.76		
Total	0.16	0.48	0.03	5.73	148	4.81	8.77

Limted PTE in tons per year

Emission Unit/Process Unit	PM	PM10	SO_2	NOx	VOC	CO	Combined HAPs
Natural Gas-Fired Combustion Units	0.11	0.44	0.03	5.73	0.32	4.81	0.11
Bindery Machine	0.049	0.049					
* King Process Color Press #67					81.6		0.00
* Lithographic Printing Press #66							0
Lithographic Press #56					4.60		0
Lithographic Press #57					2.98		0
Solvent Usage (Cleaning)					2.33		2.33
Seven Ink Jet Printers					0.76		
Total	0.16	0.48	0.03	5.73	92.6	4.81	2.44