Certified Mail Number: 7000 0600 0023 5187 0427

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

DATE: October 26, 2007

TO: Interested Parties / Applicant

RE: Print Communications / F097-24229-00298

FROM: Felicia A. Robinson
Administrator

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 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 fifteen (15) calendar days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures

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

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

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY
AND OFFICE OF ENVIRONMENTAL SERVICES

Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201

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

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.: F097-24229-00298	
ORIGINAL SIGNED BY: Felicia A. Robinson, Administrator Office of Environmental Services	Issuance Date: October 26, 2007 Expiration Date: October 26, 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) and Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary lithographic printing operation.

Source Address:	2457 East Washington Street, Indianapolis, IN 46201
Mailing Address:	2457 East Washington Street, Indianapolis, IN 46201
General Source Phone Number:	(317) 266-8208
SIC Code:	2759
County Location:	Marion
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD, Emission Offset Rules and Nonattainment NSR 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) Heidelberg MO nonheatset sheetfed lithographic press, identified as Emissions Unit EU-1, with a maximum capacity of 2,375,000 square inches per hour, constructed in 1992, and exhausting to the interior of the building.

(b) Harris M110 heatset web lithographic press, identified as Emissions Unit EU-2, with a maximum capacity of 18,720,000 square inches per hour, constructed in 1993, and exhausting to stack SV-1.

(c) Diddie Glaser nonheatset web lithographic press, identified as Emissions Unit EU-7, with a maximum capacity of 7,560,000 square inches per hour, constructed in 1965, and exhausting to the interior of the building.

(d) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(e) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(f) King Press Newscolor IV nonheatset lithographic web press, identified as Emissions Unit EU-12, with a maximum capacity of 46,448,640 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(g) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

(h) Harris M300 heatset web lithographic press, identified as Emissions Unit EU-14, with a maximum capacity of 25,920,000 square inches per hour, constructed in 2004, and exhausting to stack SV-6.

(i) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

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) Natural gas-fired combustion sources with heat input equal to or less than 10 million (1,000,000) Btu per hour.

(1) Drying Oven DO-2, with a maximum heat input capacity of 1.0 MMBtu/hr.

(2) Drying Oven DO-9, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) Drying Oven DO-13, with a maximum heat input capacity of 1.0 MMBtu/hr.

(4) Drying Oven DO-14, with a maximum heat input capacity of 1.0 MMBtu/hr.

(5) Two (2) Drying Ovens DO-15A and DO-15B, with a maximum heat input capacity of 1.0 MMBtu/hr each.

(6) Oxidizer OX-1, with a maximum heat input capacity of 0.88 MMBtu/hr, used as a voluntary control device for the presses.

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

(c) PrePress Area.

(d) Ryobi lithographic nonheatset sheet fed press.

(e) Kodak direct press.

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) 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, F097-24229-00298, 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 and OES, 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]

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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

(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 April 15 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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES 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 and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(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 and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or 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, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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
Office of Environmental Services phone: (317) 327-2234; fax: (317) 327-2274

(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

and

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by 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 and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

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

(g) 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 F097-24229-00298 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

and

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does 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 and OES determines any of the following:

(1) That this permit contains a material mistake.

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

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

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

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

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

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

and

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

(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 and OES 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 and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as 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

and

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

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

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

and

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

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

(5) The Permittee maintains records on-site, 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 and OES 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, and OES 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

and

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

The application which shall be submitted by the Permittee does require the certification by 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 and OES 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 and OES 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 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) The 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(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.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

and

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.7 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

and

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES 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.8 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.9 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

and

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

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.10 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.11 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 and OES 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.12 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.13 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.14 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 and OES, 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.15 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.

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

C.16 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

and

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

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

(d) Unless otherwise specified in this permit, 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.17 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Heidelberg MO nonheatset sheetfed lithographic press, identified as Emissions Unit EU-1, with a maximum capacity of 2,375,000 square inches per hour, constructed in 1992, and exhausting to the interior of the building.

(b) Harris M110 heatset web lithographic press, identified as Emissions Unit EU-2, with a maximum capacity of 18,720,000 square inches per hour, constructed in 1993, and exhausting to stack SV-1.

(c) Diddie Glaser nonheatset web lithographic press, identified as Emissions Unit EU-7, with a maximum capacity of 7,560,000 square inches per hour, constructed in 1965, and exhausting to the interior of the building.

(d) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(e) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(f) King Press Newscolor IV nonheatset lithographic web press, identified as Emissions Unit EU-12, with a maximum capacity of 46,448,640 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(g) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

(h) Harris M300 heatset web lithographic press, identified as Emissions Unit EU-14, with a maximum capacity of 25,920,000 square inches per hour, constructed in 2004, and exhausting to stack SV-6.

(i) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

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

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

D.1.1 Volatile Organic Compounds (VOC) FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-3]

VOC emissions from Emissions Units EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15, shall be limited to ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this requirement will limit source-wide VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) VOC emissions from Emissions Units EU-2, EU-9, EU-13, EU-14, and EU-15, individually, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 not applicable.

(b) Any change or modification which may increase the potential emissions of VOC from Emissions Units EU-1, EU-7, EU-11, or EU-12 to twenty-five (25) or more tons per twelve (12) consecutive month period, each, must be approved by the IDEM, OAQ and OES before any such change may occur. This will render the requirements of 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.1.3 VOC Emissions

(a) Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and OES reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.

(c) Compliance with Conditions D.1.1 and D.1.2 shall be determined using the following equations for VOC emissions. The total VOC emissions calculated shall be the sum of each material used on each individual printing press. Compliance with this limit will be demonstrated by using the following equations:

Heatset Presses (EU-2, EU-9, EU-13, EU-14 and EU-15)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 80% for inks and 100% for all other materials)

Non-Heatset Presses (EU-1, EU-7, EU-11 and EU-12)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 5% for inks and 100% for all other materials)

Total VOC Emissions from all presses

$$Et = En(EU\text{-}1) + En(EU\text{-}2) + En(EU\text{-}7) + En(EU\text{-}9) + En(EU\text{-}11) + En(EU\text{-}12) + En(EU\text{-}13) + En(EU\text{-}14) + En(EU\text{-}15)$$

Where:
Et = VOC emissions from all presses

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

D.1.4 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent less water used on monthly basis;

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

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

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The combined total weight of VOC emitted for each compliance period for Emissions Units EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15; and

(6) The weight of VOC emitted for each compliance period for each press (Emissions Units EU-2, EU-9, EU-13, EU-14, and EU-15).

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

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and OES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Print Communications, Inc.
Source Address: 2457 East Washington Street, Indianapolis, Indiana 46201
Mailing Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

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

and

CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
Phone: 317-327-2234
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name:	Print Communications, Inc.
Source Address:	2457 East Washington Street, Indianapolis, Indiana 46201
Mailing Address:	2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.:	F097-24229-00298

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 BRANCH

and

CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
Quarterly Report

Source Name: Print Communications, Inc.
Source Address: 2457 East Washington Street, Indianapolis, Indiana 46201
Mailing Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298
Facility: EU-2, EU-9, EU-13, EU-14, EU-15
Parameter: VOC Emissions
Limit: VOC emissions from Emissions Units EU-2, EU-9, EU-13, EU-14, and EU-15, individually, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

and

CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
Quarterly Report

Source Name:	Print Communications, Inc.
Source Address:	2457 East Washington Street, Indianapolis, Indiana 46201
Mailing Address:	2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.:	F097-24229-00298
Facility:	EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, EU-15
Parameter:	Total VOC Emissions
Limit:	VOC emissions from Emissions Units EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15, shall be limited to ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month

QUARTER: _____ YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Print Communications, Inc.
Source Address: 2457 East Washington Street, Indianapolis, Indiana 46201
Mailing Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

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:	

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	Print Communications
Source Location:	2457 East Washington Street, Indianapolis, Indiana 46201
County:	Marion
SIC Code:	2759
Permit Renewal No.:	F097-24229-00298
Permit Reviewer:	Jeffrey Hege

The Indianapolis Office of Environmental Services (OES) and the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) have reviewed an operating permit renewal application from Print Communications relating to the operation of a commercial printing source.

History

On January 19, 2007, Print Communications submitted an application to the IDEM, OAQ and OES requesting to renew its operating permit. Print Communications was issued a FESOP Renewal (F097-14820-00298) on October 17, 2002.

Permitted Emission Units and Pollution Control Equipment

(a) Heidelberg MO nonheatset sheetfed lithographic press, identified as Emissions Unit EU-1, with a maximum capacity of 2,375,000 square inches per hour, constructed in 1992, and exhausting to the interior of the building.

(b) Harris M110 heatset web lithographic press, identified as Emissions Unit EU-2, with a maximum capacity of 18,720,000 square inches per hour, constructed in 1993, and exhausting to stack SV-1.

(c) Diddie Glaser nonheatset web lithographic press, identified as Emissions Unit EU-7, with a maximum capacity of 7,560,000 square inches per hour, constructed in 1965, and exhausting to the interior of the building.

(d) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(e) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(f) King Press Newscolor IV nonheatset lithographic web press, identified as Emissions Unit EU-12, with a maximum capacity of 46,448,640 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(g) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

(h) Harris M300 heatset web lithographic press, identified as Emissions Unit EU-14, with a maximum capacity of 25,920,000 square inches per hour, constructed in 2004, and exhausting to stack SV-6.

(i) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

Emission Units and Pollution Control Equipment Removed From the Source

There are no removed Emission Units or Pollution Control Equipment.

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than 10 million (1,000,000) Btu per hour.

(1) Drying Oven DO-2, with a maximum heat input capacity of 1.0 MMBtu/hr.

(2) Drying Oven DO-9, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) Drying Oven DO-13, with a maximum heat input capacity of 1.0 MMBtu/hr.

(4) Drying Oven DO-14, with a maximum heat input capacity of 1.0 MMBtu/hr.

(5) Two (2) Drying Ovens DO-15A and DO-15B, with a maximum heat input capacity of 1.0 MMBtu/hr each.

(6) Oxidizer OX-1, with a maximum heat input capacity of 0.88 MMBtu/hr, used as a voluntary control device for the presses.

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

(c) PrePress Area.

(d) Ryobi lithographic nonheatset sheet fed press.

(e) Kodak direct press.

Existing Approvals

Since the issuance of the Federally Enforceable State Operating Permit First Renewal No. 097-14820-00298, on October 17, 2002, the source has constructed or has been operating under the following approvals:

(a) First Administrative Amendment No. 097-18447-00298, issued December 18, 2003.

(b) Second Administrative Amendment No. 097-19534-00298, issued August 4, 2004.

(c) First Minor Permit Revision No. 097-21417-00298, issued on August 8, 2005.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this Second FESOP Renewal. The following terms and conditions have been deleted or revised:

First Minor Permit Revision No. 097-21417-00298, issued on August 8, 2005.

(1) Portions of Conditions D.1.1 and D.1.4.

Reason not incorporated: Condition D.1.1 of the FESOP was revised to alter the compliance determination method for the facility. The VOC limitation was changed from 'VOC delivered' to the presses to 'VOC emitted' from the presses. Condition D.1.4 was revised (and renumbered D.1.3) to include the revised Compliance Determination methods.

(2) Condition D.1.2.

Reason not incorporated: Since the potential to emit of particulate is less than 0.551 lbs per hour (see Appendix A page 13), this rule does not apply to these presses. Condition D.1.2, therefore, has been removed.

(3) Section D.2

Reason not incorporated: Since the potential to emit of particulate is less than 0.551 lbs per hour, this rule does not apply to this equipment. Section D.2, therefore, has been removed.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 13).

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	nonattainment
PM10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

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

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment NSR.

(c) Marion County has been classified as attainment or unclassifiable for PM10, SO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.72
PM10	0.72
SO_2	0.02
VOC	443.85
CO	2.21
NO_x	2.63

HAPs	tons/year
xylene	0.42
cumene	0.40
ethyl benzene	0.08
ethylene glycol	4.07
methanol	0.46
toluene	0.69
Total	6.46

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels. Therefore, the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than 100 tons per year.

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

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 Renewal 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** single / combined
EU-1	0.52	0.52	0.0	Less than 98.1 tons per twelve (12) consecutive month period	0.0	0.0	4.07 / 6.39
EU-2	0.0	0.0	0.0		0.0	0.0	
EU-7	0.0	0.0	0.0		0.0	0.0	
EU-9	0.0	0.0	0.0		0.0	0.0	
EU-11	0.0	0.0	0.0		0.0	0.0	
EU-12	0.0	0.0	0.0		0.0	0.0	
EU-13	0.0	0.0	0.0		0.0	0.0	
EU-14	0.0	0.0	0.0		0.0	0.0	
EU-15	0.0	0.0	0.0		0.0	0.0	
Insignificant Activities	0.2	0.2	0.02	1.72	2.21	2.63	0.05 / 0.07
Total Emissions	0.72	0.72	0.02	Less than 100 tons per twelve (12) consecutive month period	2.21	2.63	4.07 / 6.46

(a) This existing stationary source is not major for PSD (326 IAC 2-2) because the emissions of each attainment regulated pollutant is less than one hundred (<100) tons per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-2(gg)(1).

(b) This existing stationary source is not major for Emission Offset (326 IAC 2-3) because the emissions of each nonattainment regulated pollutant is less than one hundred (<100) tons per year.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

(a) each criteria pollutant is limited to less than 100 tons per year,

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

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

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

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

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

(c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 14) because it is not a major source of HAPs as defined by the rule.

(d) This source is not subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating because it is not a major source of HAPs as defined by the rule.

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

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Air Quality Requirements)

Marion County has been designated as nonattainment for PM2.5. According to an EPA guidance memo dated April 5, 2005, PM10 is to be utilized as a surrogate for PM2.5 until the EPA can promulgate the PM2.5 implementation rule. PM10 emissions, and therefore PM2.5 emissions, from this source are less than one hundred (100) tons per twelve (12) consecutive month period. There have been no modifications to this source such that it is a major source of PM10 emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM2.5 emissions.

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

Print Communications is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

Print Communications has the unrestricted potential to emit VOC, a nonattainment regulated pollutant, of equal to or greater than one hundred (100) tons per year. Therefore, the PTE is being limited, enforceably, to less than one hundred (100) tons per year in order to render 326 IAC 2-3 (Emission Offset) not applicable.

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

The operation of this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Print Communications has not constructed or reconstructed a major HAP source since July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Marion County, is not required to obtain a Part 70 permit, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

The source wide potential to emit of VOC is greater than one hundred (100.0) tons per year. The source has opted to remain a FESOP source by limiting source wide emissions of VOC to less than one hundred (100) tons per year.

VOC emissions are being limited to less than 100 tons per year according to the following requirements:

(a) VOC emissions from Emissions Units EU-1, EU-2, EU-7, EU-9, EU-11, EU-12, EU-13, EU-14, and EU-15, shall be limited to ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is structured such that when including the emissions of the insignificant activities, the total source VOC emissions are less than one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-3 (Emission Offset) not applicable.

(b) Compliance with this limit shall be determined using the following equations for VOC emissions. The total VOC emissions calculated shall be the sum of each material used on each individual printing press. Compliance with this limit will be demonstrated by using the following equations:

Heatset Presses (EU-2, EU-9, EU-13, EU-14 and EU-15)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 80% for inks and 100% for all other materials)

Non-Heatset Presses (EU-1, EU-7, EU-11 and EU-12)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 5% for inks and 100% for all other materials)

Total VOC Emissions from all presses

Et = En(EU-1) + En(EU-2) + En(EU-7) + En(EU-9) + En(EU-11) + En(EU-12) + En(EU-13) + En(EU-14) + En(EU-15)

Where:

Et = VOC emissions from all presses

Compliance with this limit renders 326 IAC 2-7 (Part 70 Permit Program) not applicable to Print Communications.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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 (Fugitive Dust Emissions).

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)

This source has the potential to emit particulate of less than one hundred (100) tons per year and has actual emissions less than ten (10) tons per year. Print Communications is not specifically identified in 326 IAC 6.5-6 (Marion County). Therefore, 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County) do not apply to this source.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-2-1, none of the combustion units at this source are indirect heating units. Therefore, 326 IAC 6-2 does not apply.

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

Pursuant to 326 IAC 6-3-1(b)(14), none of the emitting units at this source has the potential to emit greater than five hundred fifty-one thousandths (0.551) pounds per hour of PM (see Appendix A pages 2 & 13). Therefore, 326 IAC 6-3 does not apply.

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

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no other specific rule in 326 IAC 8 is applicable. The PTE of VOC from Emissions Units EU-2, EU-9, EU-13, EU-14 and EU-15 individually have been limited to less than 25.0 tons per twelve (12) consecutive month period with compliance

determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to each of these Emissions Units.

VOC emissions from each of these presses are being limited as follows:

(a) VOC emissions from Emissions Units EU-2, EU-9, EU-13, EU-14, and EU-15, individually, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 not applicable.

Emissions Units EU-1, EU-7, EU-11 and EU-12 are not subject to 326 IAC 8-1-6, because potential VOC emissions from each of these emission units individually is less than 25 tons per year (see Appendix A pages 2, 4, 6 & 7).

326 IAC 8-2-5 (Paper Coating Operations)
This rule does not apply to Print Communications, since no web coating or saturation processes are used.

326 IAC 8-5-5 (Graphic Arts Operations)
This rule does not apply to Print Communications, since only lithographic and not rotogravure or flexographic, printing occurs at this location.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements included in the permit.

The Compliance Determination Requirements applicable to this source are as follows:

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

(b) Compliance with the VOC limitations shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.

(c) Compliance with the VOC limitations shall be determined using the following equations for VOC emissions. The total VOC emissions calculated shall be the sum of each material used on each individual printing press. Compliance with this limit will be demonstrated by using the following equations:

Heatset Presses (EU-2, EU-9, EU-13, EU-14 and EU-15)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 80% for inks and 100% for all other materials)

Non-Heatset Presses (EU-1, EU-7, EU-11 and EU-12)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 5% for inks and 100% for all other materials)

Total VOC Emissions from all presses

$$Et = En(EU\text{-}1) + En(EU\text{-}2) + En(EU\text{-}7) + En(EU\text{-}9) + En(EU\text{-}11) + En(EU\text{-}12) + En(EU\text{-}13) + En(EU\text{-}14) + En(EU\text{-}15)$$

Where:
Et = VOC emissions from all presses

These Compliance Determination Requirements are necessary to insure that the requirements of 326 IAC 2-3, 326 IAC 2-7 and 326 IAC 8-1-6 are not applicable.

Recommendation

The staff recommends to the Administrator that the Federally Enforceable State Operating Permit 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 application for the purposes of this review was received on January 19, 2007.

Conclusion

The operation of this commercial printing source shall be subject to the conditions of the attached Federally Enforceable State Operating Permit Renewal No. F097-24229-00298.

Appendix A: Emissions Calculations
Summary

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Press Name	VOC	Combined HAP	Highest Individual HAP (ethylene glycol)	PM / PM10	NOx	CO	SO_2
Presses							
EU-1: Heidelberg MO	3.87	1.13	0.03	0.52			
EU-2: Harris M110	45.02	0.76	0.00				
EU-7: Diddie Glaser	1.12	0.22	0.09				
EU-9: Heidelberg V-30	104.64	0.83	0.77				
EU-11: King Press, Print King IV	5.27	0.25	0.20				
EU-12: King Press, Newscolor IV	13.93	1.73	1.63				
EU-13: Heidelberg V-30	64.04	0.44	0.42				
EU-14: Harris M300	62.50	0.51	0.45				
EU-15: Harris M130	141.73	0.53	0.49				
Insignificant Activities							
Ryobi printer	0.04	0.002	0.0003				
Kodak printer	1.55	0.017	0.008				
Combustion Sources	0.14	0.05	0.047	0.20	2.63	2.21	0.02
TOTAL	443.85	6.46	4.07	0.72	2.63	2.21	0.02

Appendix A: Emissions Calculations
PM, VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Speed (Sheet/Hour)	Maximum Print Area ($Inches^2$)	Maximum PTE ($MMin^2$/Year)
EU-1: Heidelberg MO sheetfed lithographic 2,375,000 $inches^2$ per hour	5000	475 [Max. Length = 25": Max. Width= 19"]	20805

VOC Emissions

Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	2.00	19.8%	5.00%	20805	0.21
ACFS 561 Fountain Soln	0.05	7.1%	100.00%	20805	0.04
CP630 Alcohol Substitute	0.04	79.0%	100.00%	20805	0.36
A-124 B Blanket Wash	0.23	100.0%	100.00%	20805	2.43
Rycolite Blanket Wash	0.20	40%	100.00%	20805	0.83

HAP Emissions

Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.05	5%	20805	0.028
A-124 B / Xylene	0.23	1.15%	20805	0.028
A-124 B / Cumene	0.23	1.09%	20805	0.026
A-124 B / Ethyl Benzene	0.23	0%	20805	0.005
Rycolite / Methanol	0.2	20%	20805	0.416
Rycolite / Toluene	0.2	30%	20805	0.624

Particulate Emissions

Product Name	Max. Throughput ($MMin^2$/Year)	Emission Factor ($lbs/MMin^2$)	Potential to Emit (Tons/Year)	Potential to Emit (lb/hour)
Corn Starch	20805	0.05	0.52	0.119

Total PTE (ton/yr)		
Particulate	0.52	
VOCs	3.87	
Combined HAPs	1.13	
Individual HAP	0.624	toluene

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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 & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Mamimum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Maximum PTE ($MMin^2$/Year)
EU-2: Harris M110 heatset web lithographic 18,720,000 $inches^2$ per hour.	1000	26	163987

VOC Emissions Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	2.00	32.8%	80.00%	163987	43.03
Majesta 415 Fountain Soln	0.06	7.1%	100.00%	163987	0.35
A-124 B Blanket Wash	0.02	100.0%	100.00%	163987	1.64

HAP Emissions Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Majesta 415 Fountain Soln / Glycol Ether DB	0.06	6%	163987	0.295
A-124 B / Xylene	0.23	1.15%	163987	0.217
A-124 B / Cumene	0.23	1.09%	163987	0.206
A-124 B / Ethyl Benzene	0.23	0.21%	163987	0.040

Total PTE (ton/yr)		
VOCs	45.02	
Combined HAPs	0.76	
Individual HAP	0.295	glycol ether

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Mamimum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Maximum PTE ($MMin^2$/Year)
EU-7: Diddie Glaser nonheatset web lithographic 7,560,000 $inches^2$ per hour	600	17.5	66226

VOC Emissions Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	1.50	19.8%	5.00%	66226	0.49
ACFS 561 Fountain Soln	0.003	7.1%	100.00%	66226	0.01
A-124 B Blanket Wash	0.016	100.0%	100.00%	66226	0.53
Rycolite Blanket Wash	0.007	40%	100.00%	66226	0.09

HAP Emissions Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.05	5%	66226	0.091
A-124 B / Xylene	0.016	1.15%	66226	0.006
A-124 B / Cumene	0.016	1.09%	66226	0.006
A-124 B / Ethyl Benzene	0.016	0%	66226	0.001
Rycolite / Methanol	0.007	20%	66226	0.046
Rycolite / Toluene	0.007	30%	66226	0.070

Total PTE (ton/yr)		
VOCs	1.12	
Combined HAPs	0.22	
Individual HAP	0.091	ethylene glycol

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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 & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput ($MMin^2$/Year)
EU-9: Heidelberg V-30 heatset lithographic web 27,086,400 $inches^2$ per hour	1045	36	237277

VOC Emissions					
Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	3.25	32.8%	80.00%	237277	101.17
ACFS 561 Fountain Soln	0.13	7.1%	100.00%	237277	1.10
A-124 B Blanket Wash	0.02	100.0%	100.00%	237277	2.37

HAP Emissions				
Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.13	5%	237277	0.771
A-124 B / Xylene	0.02	1.15%	237277	0.027
A-124 B / Cumene	0.02	1.09%	237277	0.026
A-124 B / Ethyl Benzene	0.02	0%	237277	0.005

Total PTE (ton/yr)		
VOCs	104.64	
Combined HAPs	0.83	
Individual HAP	0.771	ethylene glycol

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput ($MMin^2$/Year)
EU-11: King Press, Print King IV nonheatset lithographic web 16,381,440 $inches^2$ per hour	632	36	143501

VOC Emissions Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	4.00	19.8%	5.00%	143501	2.84
ACFS 561 Fountain Soln	0.05	7.1%	100.00%	143501	0.28
A-124 B Blanket Wash	0.03	100.0%	100.00%	143501	2.15

HAP Emissions Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.05	5%	143501	0.196
A-124 B / Xylene	0.03	1.15%	143501	0.025
A-124 B / Cumene	0.03	1.09%	143501	0.023
A-124 B / Ethyl Benzene	0.03	0.21%	143501	0.005

Total PTE (ton/yr)		
VOCs	5.27	
Combined HAPs	0.25	
Individual HAP	0.196	ethylene glycol

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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 & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput ($MMin^2$/Year)
EU-12: King Press, Newscolor IV nonheatset lithographic web 46,448,640 $inches^2$ per hour	1792	36	406890

VOC Emissions					
Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	3.75	19.8%	5.00%	406890	7.55
ACFS 561 Fountain Soln	0.16	7.1%	100.00%	406890	2.31
A-124 B Blanket Wash	0.02	100.0%	100.00%	406890	4.07

HAP Emissions				
Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.16	5%	406890	1.628
A-124 B / Xylene	0.02	1.15%	406890	0.047
A-124 B / Cumene	0.02	1.09%	406890	0.044
A-124 B / Ethyl Benzene	0.02	0.21%	406890	0.009

Total PTE (ton/yr)		
VOCs	13.93	
Combined HAPs	1.73	
Individual HAP	1.628	ethylene glycol

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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 & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput ($MMin^2$/Year)
EU-13: Heidelberg V-30 heatset lithographic web 27,086,400 $inches^2$ per hour	1045	36	237277

VOC Emissions					
Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	2.00	32.8%	80.00%	237277	62.26
ACFS 561 Fountain Soln	0.07	7.1%	100.00%	237277	0.59
A-124 B Blanket Wash	0.01	100.0%	100.00%	237277	1.19

HAP Emissions				
Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.07	5%	237277	0.415
A-124 B / Xylene	0.01	1.15%	237277	0.014
A-124 B / Cumene	0.01	1.09%	237277	0.013
A-124 B / Ethyl Benzene	0.01	0.21%	237277	0.002

Total PTE (ton/yr)		
VOCs	64.04	
Combined HAPs	0.44	
Individual HAP	0.415	ethylene glycol

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput (MMin^2/YEAR)
EU-14: Harris M300 heatset web lithographic 25,920,000 inches^2 per hour	1000	36	227059

VOC Emissions					
Product Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Max. Throughput (MMin^2/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	2.00	32.8%	80.00%	227059	59.58
ACFS 561 Fountain Soln	0.08	7.1%	100.00%	227059	0.64
A-124 B Blanket Wash	0.02	100.0%	100.00%	227059	2.27

HAP Emissions				
Product Name / HAP	Maxium Coverage (lbs/MMin^2)	HAP Content (wt%)	Max. Throughput (MMin^2/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.08	5%	227059	0.454
A-124 B / Xylene	0.02	1.15%	227059	0.026
A-124 B / Cumene	0.02	1.09%	227059	0.025
A-124 B / Ethyl Benzene	0.02	0%	227059	0.005

Total PTE (ton/yr)	
VOCs	62.50
Combined HAPs	0.51
Individual HAP	0.454

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Line Speed (Feet/Min)	Maximum Print Width (Inches)	Max. Throughput (Min^2/Year)
EU-15: Harris M130 heatset web lithographic 37,319,040 $inches^2$ per hour	1364	38	326915

VOC Emissions					
Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	3.25	32.8%	80.00%	326915	139.40
ACFS 561 Fountain Soln	0.06	7.1%	100.00%	326915	0.70
A-124 B Blanket Wash	0.01	100.0%	100.00%	326915	1.63

HAP Emissions				
Product Name / HAP	Maxium Coverage '(lbs/MMin^2)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.06	5%	326915	0.490
A-124 B / Xylene	0.01	1.15%	326915	0.019
A-124 B / Cumene	0.01	1.09%	326915	0.018
A-124 B / Ethyl Benzene	0.01	0.21%	326915	0.003

Total PTE (ton/yr)	
VOCs	141.73
Combined HAPs	0.53
Individual HAP	0.490

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Speed (Sheets/Hour)	Maximum Print Area ($Inches^2$)	Max. Throughput (Min^2/Year)
EU-D1: Kodak Direct Press 1,610,000 $inches^2$ per hour	7000	230 [Max. Length = 12.99": Max. Width= 17.72"]	14104

VOC Emissions					
Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
Flint Arrowstar Process Inks	0.50	23.9%	100.00%	14104	0.84
A-124 B Blanket Wash	0.10	100.0%	100.00%	14104	0.71

HAP Emissions				
Product Name / HAP	Maxium Coverage '(lbs/MMin^2)	HAP Content (wt%)	Max. Throughput ($MMin^2$/Year)	Potential to Emit (Tons/Year)
A-124 B / Xylene	0.10	1.15%	14104	0.008
A-124 B / Cumene	0.10	1.09%	14104	0.008
A-124 B / Ethyl Benzene	0.10	0.21%	14104	0.001

Total PTE (ton/yr)	
VOCs	1.55
Combined HAPs	0.01
Individual HAP	0.008

METHODOLOGY
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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 & HAP From Printing Press Operations

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapolis, IN 46201
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Throughput Press I.D.	Maximum Speed (Sheet/Hour)	Maximum Print Area ($Inches^2$)	Max. Throughput ($MMin^2$/Year)
Insig. Act. - Ryobi 3302 sheetfed lithographic 53,352 $inches^2$ per hour.	250	216 [Max. Length = 18": Max. Width= 12"]	473.04

VOC Emissions

Product Name	Maxium Coverage ($lbs/MMin^2$)	Weight % Volatiles*	Flash Off %	Max. Throughput ($lbs/MMin^2$)	Potential to Emit (Tons/Year)
Various Braden Sutphin Inks	2.50	19.8%	5.00%	473	0.0059
ACFS 561 Fountain Soln	0.12	7.1%	100.00%	473	0.002
A-124 B Blanket Wash	0.115	100.0%	100.00%	473	0.027

HAP Emissions

Product Name / HAP	Maxium Coverage ($lbs/MMin^2$)	HAP Content (wt%)	Max. Throughput ($lbs/MMin^2$)	Potential to Emit (Tons/Year)
ACFS 561 Fountain Soln / Ethylene Glycol	0.12	5%	473	0.001
A-124 B / Xylene	0.115	1.15%	473	0.0003
A-124 B / Cumene	0.115	1.09%	473	0.0003
A-124 B / Ethyl Benzene	0.115	0.21%	473	0.0001

Total PTE (ton/yr)		
VOCs	0.035	
Combined HAPs	0.002	
Individual HAP	0.0003	toluene

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NONHEATSET LITHOGRAPHIC HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS 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
Natural Gas Combustion

Company Name: Print Communications
Address City IN Zip: 2457 East Washington St., Indianapol
Permit Number: F097-24229-00298
Plt ID: 00298
Reviewer: Jeffrey Hege
Date: 4/16/2007

Natural Gas Fired Unit Specifications

Unit Descriptions	Maximum Heat Input Capacity Per Unit [MMBtu/hr]	Number of Units	Combined Maximum Heat Input Capacity [MMBtu/hr]	Potential Natural Gas Usage [scf/hr] (1)
DO-2 Drying Oven	1.00	1	1.000	1,000
DO-9 Drying Oven	1.00	1	1.000	1,000
DO-13 Drying Oven	1.00	1	1.000	1,000
DO-14 Drying Oven	1.00	1	1.000	1,000
DO-15 Drying Ovens	1.00	2	2.000	2,000
OX-1 Oxidizer	0.88	1	0.875	875
	TOTAL	**6**	**6.000**	**6,000**

Natural Gas Fired Unit Potential Emissions

Pollutant	Emission Factor [lb/MMscf] (2)	Potential Emissions [lb/hr] (3)	Potential Emissions [tpy] (4)
NO_X	100	0.6000	2.63
CO	84	0.5040	2.21
VOC	5.5	0.0330	0.14
SO_2	0.6	0.0036	0.02
PM/PM_{10}	7.6	0.0456	0.20
Benzene	2.1E-03	0.000	0.0001
Dichlorobenzene	1.2E-03	0.000	0.0000
Formaldehyde	7.5E-02	0.000	0.0020
Hexane	1.8E+00	0.011	0.0473
Toluene	3.4E-03	0.000	0.0001
Lead	5.0E-04	0.000	0.0000
Cadmium	1.1E-03	0.000	0.0000
Chromium	1.4E-03	0.000	0.0000
Manganese	3.8E-04	0.000	0.0000
Nickel	2.1E-03	0.000	0.0001
Combined HAPs	NA	0.011	0.0496

Notes and Methodology

(1) Potential Natural Gas Usage [scf/hr] = Combined Maximum Heat Input Capacity [MMBtu/hr] x 1,000,000 Btu/MMBtu / 1,000 Btu/scf
Assumed heating value of natural gas to be 1,000 Btu/scf.
(2) Emission factors are from AP-42, Tables 1.4-1 and 1.4-2. Utilized the NOx and CO emission factors for an uncontrolled small boiler (i.e. < 100 MMBtu/hr heat input).
All emission factors are for normal firing. The PM/PM10 emission factor is filterable and condensable particulate combined.
The HAPs above include the 5 organic HAPs and 5 metal HAPs with the highest emission factors.
(3) Potential Emissions [lb/hr] = Total Potential Natural Gas Usage [scf/hr] / 1,000,000 scf/MMscf x Emission Factor [lb/MMscf]
(4) Potential Emissions [tpy] = Potential Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton