



TO: Interested Parties / Applicant

RE: The Jackson Group / M097-24437-00329

FROM: Felicia A. Robinson  
Administrator  
City of Indianapolis  
Office of Environmental Services

## Notice of Decision – Approval

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

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

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

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

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

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

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

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](http://indygov.org/dpw)



June 25, 2007

Diane Bravo  
The Jackson Group  
5804 Churchman By-Pass  
Indianapolis, Indiana 46203-6109

**Certified Mail:** 7000 0600 0023 5187 1684

Re: M097-24437-00329  
2nd Notice-Only change to M097-17631-00329

Dear Ms. Bravo:

The Jackson Group was issued a Minor Source Operating Permit (MSOP) on August 18, 2003, for the operation of a stationary printing plant, located at 5804 Churchman By-Pass, Indianapolis, Indiana, 46203. On October 19, 2004, the first Notice-Only Change, M097-19966-00329, was issued to the source. On March 13, 2007, an application was received requesting a notice-only change to MSOP 097-17631-00329 to reflect the addition of a printing press.

Pursuant to the provisions of 326 IAC 2-6.1-6(d)(2) the Notice-Only change to an existing Minor Source Operating Permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Monica Doyle, (317) 327-2846.

Sincerely,

Felicia A. Robinson  
Administrator

mmd

cc: OES Files - 2 copies  
Compliance - Matt Mosier  
USEPA - R5  
Marion County Health Dept.  
IDEM, Mindy Hahn



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**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY**

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT**

**The Jackson Group  
5804 Churchman By-Pass  
Indianapolis, Indiana 46203**

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

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 Minor Source Operating Permit.

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

Operation Permit No.: MSOP 097-17631-00329	
Originally signed by  John B. Chavez Administrator	Issuance Date: August 18, 2003  Expiration Date: August 18, 2008
First Notice-Only Change, M097-19966-00329, issued on October 19, 2004	
Second Notice-Only Change: M097-24437-00329	Sections Affected: Entire Permit
Issued by: ORIGINAL SIGNED BY  Felicia A. Robinson Administrator Office of Environmental Services	Issuance Date: June 25, 2007  Expiration Date: August 18, 2008



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

**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](http://indygov.org/dpw)

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis 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.

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

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The Permittee owns and operates a stationary printing plant.

Source Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203  
Mailing Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203  
General Source Phone: (317) 791-1414  
SIC Code: 2752  
County Location: Marion  
Source Location Status: Non-attainment for 8-hour ozone and PM-2.5  
Attainment for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source under PSD Rules, Emission Offset, Non-attainment NSR  
Minor Source, Section 112 of the Clean Air Act

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### A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) Jackson Press, Inc., Large Press Department:

- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15,000 IPH (Images per Hour).
- (2) One (1) 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 16,000 IPH (Images per Hour).
- (3) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9,000 IPH (Images per Hour).
- (4) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7,000 IPH (Images per Hour).

(b) Jackson Press, Inc., Small Press Department:

- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5,000 IPH (Images per Hour).

- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3,000 IPH (Images per Hour).
  
- (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5,000 IPH (Images per Hour).
  
- (c) Total Response, Inc., Mailing Department:
  - (1) Two (2) 270G Videojet Systems for address labeling, identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

## **SECTION B GENERAL CONDITIONS**

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

### **B.1 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- (a) This permit, M097-17631-0000329, 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 Effective Date of the Permit [IC 13-15-5-3]**

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

### **B.5 Modification to Permit [326 IAC 2]**

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

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

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

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

- (c) A copy of the PMP=s shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ AND OES. IDEM, OAQ AND OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an authorized individual@ as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
MC 61-53 IGCN 1003  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
and  
  
Office of Environmental Services  
Air Quality Management Section  
Compliance Data Group  
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.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No Permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

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B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]  
[IC 13-30-3-1]

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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 and OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this

permit or any operating permit revisions;

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

**B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ and OES shall issue a revised permit.

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

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to 097-24437-00329 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.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: 317-327-2234 (ask for OES Annual Billing Section), to determine the appropriate permit fee.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, OAQ and OES, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of 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.4 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.5 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  
MC 61-52 IGCN 1003  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services  
Air Compliance  
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 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and OES.

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

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

and

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

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

- (b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and OES if the source submits to IDEM, OAQ and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

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### C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

## Compliance Monitoring Requirements

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### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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

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### C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

## Record Keeping and Reporting Requirements

### C.10 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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### C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (a) Records of all required data, reports and support information 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 Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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### C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

and

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

- (c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report do not require the certification by an ~~authorized individual~~ as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Jackson Press, Inc., Large Press Department:
- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15,000 IPH (Images per hour).
  - (2) One (1) 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 16,000 IPH (Images per Hour).
  - (3) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9,000 IPH (Images per hour).
  - (4) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7,000 IPH (Images per hour).
- (b) Jackson Press, Inc., Small Press Department:
- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5,000 IPH (Images per hour).
  - (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3,000 IPH (Images per hour).
  - (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5,000 IPH (Images per hour).
- (c) Total Response, Inc., Mailing Department:
- (1) Two (2) 270G Videojet Systems for address labeling identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

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

### Emission Limitations and Standards

#### D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

#### D.1.2 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6 and 2-4.1]

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

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

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

**D.1.3 Record Keeping Requirements**

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To document compliance with Condition D.1.2, the Permittee shall maintain records of the VOC content and the quantity of each coating material and solvent used and the HAP content and the quantity of each coating material and solvent used.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: The Jackson Group  
Source Address: 5804 Churchman By-Pass, Indianapolis, Indiana, 46203  
Mailing Address: 5804 Churchman By-Pass, Indianapolis, Indiana, 46203  
MSOP No.: M097-17631-00329

<p><b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b></p> <p>Please check what document is being certified:</p> <p><input type="checkbox"/> Annual Compliance Notification</p> <p><input type="checkbox"/> Test Result (specify) _____</p> <p><input type="checkbox"/> Report (specify) _____</p> <p><input type="checkbox"/> Notification (specify) _____</p> <p><input type="checkbox"/> Affidavit (specify) _____</p> <p><input type="checkbox"/> Other (specify) _____</p>
--

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
AND  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>The Jackson Group</b>
<b>Address:</b>	<b>5804 Churchman By-Pass</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Phone #:</b>	<b>(317) 791-1414</b>
<b>MSOP #:</b>	<b>097-17631-00329</b>

I hereby certify that The Jackson Group is  still in operation.  
 no longer in operation.

I hereby certify that The Jackson Group is  in compliance with the requirements of MSOP 097-17631- 00329.  
 not in compliance with the requirements of MSOP 097-17631- 00329.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

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

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

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

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

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

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

COMPANY: The Jackson Group PHONE NO. (317)791-1414  
LOCATION: INDIANAPOLIS, MARION COUNTY  
PERMIT NO. 097-17631 AFS PLANT ID: 00329 AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:  
\_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 ~~a~~Malfunction@ definition**

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

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

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

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

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

**Source Background and Description**

**Source Name:** The Jackson Group  
**Source Location:** 5804 Churchman By-Pass, Indianapolis, IN 46203  
**County:** Marion  
**SIC Code:** 2759  
**Operation Permit No.:** M097-17631-00329  
**Notice-Only Change:** M097-24437-00329  
**Permit Reviewer:** Monica Doyle

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES) have reviewed an application from The Jackson Group (comprised of three separate companies under common ownership: Jackson Press, Inc., Total Response, Inc., and Jackson Studios Inc.) requesting a Notice-only change to MSOP 097-17631-00329, to reflect the addition of a printing press.

**New Emission Units and Pollution Control Equipment**

The source consists of the following new emission unit, which will be constructed in 2007:

One (1) 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 16,000 IPH (Images per Hour).

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Jackson Press, Inc., Large Press Department:
- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15,000 IPH (Images per Hour).
  - (2) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9,000 IPH (Images per Hour).
  - (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7,000 IPH (Images per Hour).
- (b) Jackson Press, Inc., Small Press Department:
- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a

maximum printing width 13.56 inches and a maximum operating capacity of 5,000 IPH (Images per Hour).

- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3,000 IPH (Images per Hour).
- (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5,000 IPH (Images per Hour).

(c) Total Response, Inc., Mailing Department:

- (1) Two (2) 270G Videojet Systems for address labeling, identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

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

- (a) MSOP 097-17631-00329, issued on August 18, 2003;
- (b) First Notice Only Change, 097-19966-00329, issued on October 19, 2004.

All conditions from previous approvals were incorporated into this permit.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Justification for the Revision**

- (a) Pursuant to 326 IAC 2-6.1-6(d)(13), as a modification that adds an emissions unit or units, or makes changes to the processes of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, and will not result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3, the addition of EU 10 is a Notice-Only Change.
- (b) This application is being processed in accordance with 326 IAC 2-6.1-6. Following this Notice-Only Change, M097-24437-00329, the potential to emit of PM, PM10, SO2, VOC, and NOx remains less than one hundred (100) tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-6.1.

### **Recommendation**

The staff recommends to the Administrator that the modification 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.

A complete application for the purposes of this review was received on March 13, 2007, with additional information received on March 15, 2007, and April 11, 2007.

### Emission Calculations

Emission calculations for this source can be found in Appendix A, pages 1 through 2.

### Potential To Emit of Source

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

Pollutant	Existing Emission Units, Prior to Revision	Notice Only Change Emission Increase/Decrease	Existing and New Emission Units, After Revision
PM	6.10	-3.92 *	2.18
PM-10	6.10	-3.92 *	2.18
SO <sub>2</sub>	0.00	0.00	0.00
VOC	54.35	2.92	57.27
CO	0.00	0.00	0.00
NO <sub>x</sub>	0.00	0.00	0.00
<b>HAPs</b>			
Toluene	6.91	0.00	6.91
Ethylene Glycol	2.01	0.00	2.01
Glycol Ethers	7.24	0.006	7.246
Methanol	2.95	0.00	2.95
Hexane	0.38	0.00	0.38
Xylene	0.00	0.011	0.011
Cumene	0.00	0.009	0.009
TOTAL HAP's	19.49	0.026	19.516

\* PM and PM-10 emissions decreased due to revised calculations for cornstarch substrate application. Previously transfer efficiency was assumed to be 0%. A more accurate transfer efficiency has been determined. See emission calculations.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) 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/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile

organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	nonattainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-1.1-5.
- (b) Marion County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Non Attainment New Source Review, 326 IAC 2-1.1-5.
- (c) Marion County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, 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 revision revoking the one-hour ozone standard in Indiana

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	Not Reported
SO <sub>2</sub>	Not Reported
VOC	5.12
CO	Not Reported
NO <sub>x</sub>	Not Reported
HAPs	Not Reported

### Source Status

Existing Source PSD, Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential To Emit (tons/year)
PM	2.18
PM-10	2.18
SO <sub>2</sub>	0.00
VOC	57.27
CO	0.00
NO <sub>x</sub>	0.00

HAPs	Potential To Emit (tons/year)
Single HAP	< 10
Combined HAPs	< 25

- (a) This modification to an existing minor PSD stationary source will not change the PSD minor status, because the emissions from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor Emission Offset stationary source will not change the Emission Offset minor status, because the VOC emissions from the entire source will continue to be limited to less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

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

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.
- (b) New Source Performance Standards (NSPS):

40 CFR, § 60.430, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12). This standard applies to each publication rotogravure printing press, that commences construction, modification or reconstruction after October 28, 1980.

The 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 is not subject to the NSPS, because it is not a rotogravure printing press.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

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

40 CFR, ' 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry (326 IAC 20-18). This standard applies to major source of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wideweb flexographic printing presses are operated.

The 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 is not subject to the NESHAP, because it is not a publication, product and packaging rotogravure printing press, nor is it a wide-web flexographic printing press, and the source is not major for single HAP and combined HAPs.

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

40 CFR, ' 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry (326 IAC 20-65). This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place.

The 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 is not subject to this NESHAP, because the source is not major for single HAP and combined HAPs and web coating in lithography is specifically exempted by ' 63.3300(c).

**State Rule Applicability - Entire Source**

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR, because it has the potential to emit less than 100 tons of PM10 (as a surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

326 IAC 2-2 (PSD)

This modification to an existing minor PSD stationary source will not change the PSD minor status, because the emissions from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset)

This modification to an existing minor Emission Offset stationary source will not change the Emission Offset minor status, because the VOC emissions from the entire source will continue to be limited to less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

326 IAC 2-5.1-3 (Permits) and 326 IAC 2-6.1 (Minor Source Operating Permit)

This source is subject to the requirements to obtain a minor source operating permit under 326 IAC 2-6.1, because it is an existing source with a potential to emit of Volatile Organic Compounds (VOC) greater than 25 tons per year.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (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. The Jackson Group 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) does not apply to this source.

### State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 6-3-1(b)(14), no emitting unit has the potential to emit greater than five hundred fifty-one thousandths (0.551) pounds per hour, 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 article 8 is applicable. The printing press identified as EU10 is not subject to 326 IAC 8-1-6, because potential VOC emissions from the emission unit is less than 25 tons per year.

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

This rule does not apply to the printing press identified as EU10, since no web coating or saturation process is used.

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

Since the printing press identified as EU10 is lithographic and is not rotogravure or flexographic, this rule does not apply.

### Proposed Changes

The changes listed below have been made to MSOP 097-17631-00329. Deleted language appears as ~~strikethroughs~~, and new language appears in **bold**.

1. The mailing address for IDEM throughout the permit has been changed as follows:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~  
**MC 61-52 IGCN 1003**  
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

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

2. To reflect the change in the attainment status of Marion County, as well as remove the identification of the authorized individual, Condition A.1 has been changed as follows:

~~Authorized Individual: Director of Operations~~  
Source Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203  
Mailing Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203  
General Source Phone: (317) 791-1414  
SIC Code: 2752  
County Location: Marion  
Source Location Status: Nonattainment for 8-hour ozone standard **and PM-2.5**  
Attainment for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source under PSD Rules, **Emission Offset, Non-attainment NSR**  
Minor Source, Section 112 of the Clean Air Act

3. IDEM OAQ's fax number has been revised on the Malfunction Report form as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-~~5967~~ **6865**

4. IDEM and OES have decided to include the following updates to further address and clarify the permit terms and the terms of the conditions. This includes the relocation of the Permit No Defense condition to the cover page, the addition of the condition Term of Conditions [326 IAC 2-1.1-9.5] and changes to the following conditions:

~~B.1 Permit No Defense [IC 13]~~

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~~This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

Cover Page:

**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 Minor Source Operating Permit.**

~~B.2~~ **B.1** Definitions

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

**B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) **This permit, M097-17631-00329, 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]**

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**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.3 B.4 Effective Date of the Permit [IC13-15-5-3]**

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

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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

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

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) **All terms and conditions of permits established prior to 097-24437-00329 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 B.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: ~~1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section)~~ **number: 317-327-2234 (ask for OES Annual Billing Section)**, to determine the appropriate permit fee.
5. Sections A.2 and D.1 have been changed to reflect the addition of a printing press, as well as correct previous 326 IAC 6-3-2 applicability. Emission Units EU2, EU3, EU4, EU5, EU6, EU1, and EU10 have potential emissions less than 0.551 lb/hr and are exempt from 326 IAC 6-3-2. Section D.1.1 has been removed, and subsequent sections

renumbered.

(a) Jackson Press, Inc., Large Press Department:

- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15000 IPH (Images per Hour).
- (2) One (1) 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 16,000 IPH (Images per Hour).**
- ~~(2)~~ **(3)** One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9000 IPH (Images per Hour).
- ~~(3)~~ **(4)** One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7000 IPH (Images per Hour).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Jackson Press, Inc., Large Press Department:
- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15,000 IPH (Images per hour).
  - (2) One (1) 700 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU10 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 16,000 IPH (Images per Hour).**
  - ~~(2) (3)~~ One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9,000 IPH (Images per hour).
  - ~~(3) (4)~~ One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7,000 IPH (Images per hour).
- (b) Jackson Press, Inc., Small Press Department:
- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5,000 IPH (Images per hour).
  - (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3,000 IPH (Images per hour).
  - (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5,000 IPH (Images per hour).
- (c) Total Response, Inc., Mailing Department:
- (1) Two (2) 270G Videojet Systems for address labeling identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

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

### ~~D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Large Press Department shall not exceed 1.32 pounds per hour when operating with a corn starch process weight rate of 369 pounds per hour.~~

~~The pounds per hour limitation was calculated with the following equation:~~

~~Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be~~

accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

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**D.1.2 1 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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**D.1.3 2 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6 and 2-4.1]**

- (a) Any change or modification which will increase the potential to emit from the presses of Volatile Organic Compounds (VOCs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 8-1-6.
- (b) Any change or modification which will increase the potential to emit from the presses of a single Hazardous Air Pollutant (HAP) to ten (10) tons per year or a combination of Hazardous Air Pollutants (HAPs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 2-4.1.

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

**D.1.4 3 Record Keeping Requirements**

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To document compliance with Condition ~~D.1.3~~ **D.1.2**, the Permittee shall maintain records of the VOC content and the quantity of each coating material and solvent used and the HAP content and the quantity of each coating material and solvent used.

**Conclusion**

The operation of this stationary printing plant shall be subject to the conditions of the attached Notice-Only Change to Minor Source Operating Permit 097-24437-00329.

**PM and PM-10 Emissions**

Company Name : The Jackson Group  
 Street Address : 5804 Churchman By-Pass, Indianapolis, IN 46203  
 County : Marion County  
 Operation Permit No. : M097-17631-00329  
 Notice-Only Change Permit No.: M097-24437-00329  
 Reviewer : Monica Doyle

**LARGE PRESS DEPARTMENT**

Emission Unit Id	Product	Max. Usage Rate (lbs/mmsq.in)	Maximum Capacity (mmsq.in/hr)	Max. Emissions (lbs/hr)*	lbs/day	Max. Emissions (tons/yr)	Transfer Efficiency
706 ROLAND							
EU1	CORN STARCH	0.050	11.89	0.1486	3.5670	0.65	75%
700 ROLAND							
EU10	CORN STARCH	0.050	11.89	0.1486	3.5670	0.65	75%
440 ROLAND REKORD							
EU2	CORN STARCH	0.05	10.11	0.1264	3.0330	0.55	75%
26 KOMORI							
EU3	CORN STARCH	0.05	3.1100	0.0389	0.9330	0.17	75%
				<b>Subtotal</b>	<b>11.1000</b>	<b>2.03</b>	

**SMALL PRESS DEPARTMENT**

Emission Unit Id	Product	Max. Usage Rate (lbs/mmsq.in)	Maximum Capacity (mmsq.in/hr)	Max. Emissions (lbs/hr)	lbs/day	Max. Emissions (tons/yr)	Transfer Efficiency
E47 HAMADA							
EU4	CORN STARCH	0.05	1.22	0.0153	0.3660	0.07	75%
665 HAMADA							
EU5	CORN STARCH	0.05	0.57	0.0071	0.1710	0.03	75%
665 HAMADA							
EU6	CORN STARCH	0.05	0.95	0.0119	0.2850	0.05	75%
				<b>Subtotal</b>	<b>0.8220</b>	<b>0.15</b>	

**TOTAL**                      **11.9220**                      **2.18**

**Methodology :-**

Max. Emissions (lbs/hr) = Maximum Capacity (mmsq.in/hr) \* Maximum Usage Rate (lbs/mmsq.in)  
 Max. Emissions (tons/yr) = Max. Emissions (lbs/hr) \* 8760 (hrs/yr) \* 1ton/2000lbs \* (1-Transfer Efficiency)

Transfer efficiency for cornstarch application is estimated to be 75%. This is based on the transfer efficiency for airless spray coating for flat surfaces and taken from the Air & Waste Management Association Air Pollution Engineering Manual, Second Edition, 2000.

**VOC and HAP Emissions - EU10**

Company Name : The Jackson Group  
 Street Address : 5804 Churchman By-Pass, Indianapolis, IN 46203  
 County : Marion County  
 Operation Permit No. : M097-17631-00329  
 Notice-Only Change Permit No.: M097-24437-00329  
 Reviewer : Monica Doyle

*VOC Emissions from Inks and Coatings*

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin <sup>2</sup> /Year	<sup>(4)</sup> Potential VOC Emissions (tpy)
74085	Various Kohl and Madden Non-Heat Set Inks	Ink	2.0	11.0%	5%	104,043	0.572
74081	Rycoline Diamond Coat Satin	Coating	2.0	1.5%	5%	104,043	0.078

*VOC Emissions from Fountain Solution and Press Cleaning*

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	<sup>(4)</sup> Potential VOC Emissions (tpy)
50698	Printers Service Foundation Concentrate 3451U	Fountain Conc..	0.01	8.2%	100%	0.06
50700	Printers Service Autowash 4002F	Blanket Wash	0.04	100.0%	100%	2.21

*HAP Emissions*

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
50698	Printers Service Foundation Concentrate 3451U	Glycol Ether	10.0%	0.006
50700	Printers Service Autowash 4002F	Xylene	0.50%	0.011
		Cumene	0.40%	0.009

**Total Potential VOC Emissions                    2.92**

**Total Potential Combined HAPS                0.026**

**Methodology**

<sup>(1)</sup> Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners from throughput and actual usage

<sup>(2)</sup> VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press

<sup>(3)</sup> Flash off % is determined from the EPA CTG Document for Offset Lithographic Printing

<sup>(4)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time