



TO: Interested Parties / Applicant

RE: Shorewood Packaging Corporation of Indiana / F097-24918-00107

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

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



July 10, 2007

Kenny Lynn
Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, Indiana 46221-0069

Certified Mail: 7000 0600 0023 5187 1790

Re: F097-24918-00107
First Administrative Amendment to
F097-13958-00107

Dear Mr. Lynn:

Shorewood Packaging Corporation of Indiana was issued a Federally Enforceable Operating Permit (FESOP), F097-13958-00107, on November 7, 2003, for the operation of a stationary lithographic printing operation, located 620 South Belmont Avenue, Indianapolis, Indiana, 46221. On June 15, 2004, the first Minor Permit Revision, F097-18937-00107, was issued to the source, and on October 19, 2006, the first Significant Permit Revision, F097-23126-00107, was issued to the source.

A letter requesting an Administrative Amendment to modify the descriptive language in the permit was received on June 13, 2007. The source requested approval to construct a new printing press identified as H1, and remove a printing press, identified as M4. Based on information provided by the source and verified by OES, the potential to emit of H1 is 27.22 tons per year of VOC, 0.70 tons per year of combined HAPs, and 0.61 tons per year of PM-10 (see attached calculations).

Pursuant to 326 IAC 2-8-10(a)(14), 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 H1 is an Administrative Amendment.

The current limited PTE of VOC is 92 tons per year. The addition of press H1 will not affect the FESOP limits currently contained in the permit. Therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows: (the bold language is new language that has been added, and the language with a line through it has been taken out).

1. IDEM, OAQ, and OES are no longer identifying the "Authorized Individual" in the permit. Condition A.1 has been changed as follows:

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

The Permittee owns and operates a stationary lithographic printing operation.

Authorized Individual:	Regional Manager – Safety and Environment
Source Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
General Source Phone:	(317) 635-7777



Air Quality Hotline: 317-327-4AIR | 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

SIC Code: 2752
County Location: Marion
Source Location Status: Nonattainment for 8-hour ozone and PM2.5
Attainment for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD, Emission Offset and Nonattainment
NSR Rules;
Minor Source, Section 112 of the Clean Air Act

2. To reflect the equipment changes at the source, Condition A.2 has been changed as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1;
- (b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4;
- ~~(c) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 2004, identified as M4, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and~~
- (c) One (1) Heidelberg Sheetfed Lithographic Printing Press, approved for construction in 2007, identified as H1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and**
- (d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.

3. To reflect the equipment changes to the source, Section D.1 has been changed as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1;
- (b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4;
- ~~(c) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 2004, identified as M4, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and~~
- (c) One (1) Heidelberg Sheetfed Lithographic Printing Press, approved for construction in 2007, identified as H1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and**
- (d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

The amount of VOC delivered to the printing presses, identified as M1, M2, ~~M4~~ **H1**, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are less than ninety-two (92) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall satisfy the requirements of 326 IAC 2-8 (FESOP).

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

The amount of VOC delivered to the printing presses, identified as M1, M2, ~~M4~~ **H1**, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

- (a) The amount of single HAP delivered to the printing presses identified as M1, M2, ~~M4~~ **H1**, and K-1, plus the amount of single HAP used for clean-up of the printing presses shall be

limited such that single HAP emitted is less than 8.0 tons per twelve consecutive month period with compliance determined at the end of each month.

- (b) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, ~~M4~~ H1, and K-1, plus the amount of combination of HAPs used for clean-up of the printing presses shall be limited such that combination of HAPs emitted is less than 20 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with Conditions D.1.1 and D.1.2 for VOC emissions shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor (based on EPA document "Draft Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing", EPA-HQ-OAR-2006-0536, July, 2006) for inks used on Presses M1, M2, ~~M4~~ H1, and K-1.

D.1.5 Hazardous Air Pollutants (HAPs)

Compliance with Condition D.1.3 for single HAP and combination of HAPs emissions shall be determined within 30 days of the end of each month based on the total single HAP usage and combination of HAPs usage for the most recent twelve (12) month period. The monthly single HAP and combination of HAPs emissions shall be based on the monthly usage of HAP containing materials, percent weight of HAPs in materials used, and shall assume a 95% volatile organic HAP retention factor (based on EPA document "Draft Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing", EPA-HQ-OAR-2006-0536, July, 2006) for inks used on Presses M1, M2, ~~M4~~ H1, and K-1.

4. All reporting forms have replaced references to M4 with H1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107
Facility: M1, M2, ~~M4~~ H1, K-1
Parameter: Single HAP and Total HAPs

Limit: 1) The amount of single HAP delivered to the printing presses identified as M1, M2, ~~M4~~ H1, and K-1, plus the amount of single HAP used for clean-up of the printing presses shall be limited such that single HAP emitted is less than 8.0 tons per twelve consecutive month period with compliance determined at the end of each month.

2) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, ~~M4~~ H1, and K-1, plus the amount of combination of HAPs used for clean-up of the printing presses shall be limited such that combination of HAPs emitted is less than 20 tons per twelve consecutive month period with compliance determined at the end of each month.

...

5. 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

6. 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 changes to the following C conditions: Overall Source Limit and Actions Related to Noncompliance Demonstrated by a Stack Test.

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than ~~one hundred~~ **one hundred** (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;

C.13 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, and OES that retesting in ~~one hundred and twenty~~ **one hundred twenty** (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator

Attachments

mmd

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



**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, Indiana 46221**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and 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.

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.

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.

Operation Permit No.: F097-13958-00107	
Original signed by, John B. Chavez , Administrator Office of Environmental Services	Issuance Date: November 7, 2003 Expiration Date: November 7, 2008
First Minor Permit Revision No. F097-18937-00107, issued on June 15, 2004 First Significant Permit Revision No.: F097-23126-00107, issued on October 19, 2006	
First Administrative Amendment No.: F097-24918-00107	Pages affected: Entire permit
Issued by: ORIGINAL SIGNED BY Felicia A. Robinson Administrator Indianapolis Office of Environmental Services	Issuance Date: July 10, 2007 Expiration Date: November 7, 2008



Air Quality Hotline: 317-327-4AIR | 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

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 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:	620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
General Source Phone:	(317) 635-7777
SIC Code:	2752
County Location:	Marion
Source Location Status:	Nonattainment for 8-hour ozone and PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD, Emission Offset and Nonattainment NSR Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1;
- (b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4;
- (c) One (1) Heidelberg Sheetfed Lithographic Printing Press, approved for construction in 2007, identified as H1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and
- (d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.

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, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) natural gas fired boiler with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972;

- (2) one (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and
- (3) one (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.
- (b) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents characterized as follows:
 - 1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F)
 - 2) having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 °F)The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) Closed loop heating and cooling systems.
- (g) Infrared curing equipment
- (h) Exposure chamber ("tower", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (i) Any of the following structural steel and bridge fabrication activities:
 - 1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
 - 2) Using 80 tons or less of welding combustibles
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Heat exchanger cleaning and repair.
- (l) 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.
- (m) Paved and unpaved roads and parking lots with public access.
- (n) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (o) Other activities and categories with PM/PM10 emissions below insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: anti-offset powder usage at each press with maximum usage for all presses combined resulting in calculated potential particulate emissions of 0.6 pounds per hour and 14 pounds per day.

- (p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:
- 1) one (1) pre-press area, installed in 1971, identified as PA-1, used for photographing, film developing, and plate preparation for the printing operation; and
 - 2) twelve (12) folders/glueers.
 - 3) One (1) Image Ink Jet Printer attachment (ID IM-1) for the folder/glueers, using a maximum of 0.0007 gallons per hour of ink and 0.0013 gallons per hour of additive, exhausting inside the building.

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 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, F097-13958-00107, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

-
- (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, the 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 the 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 the "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, and OES, 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 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and the 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.9 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.10 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 in letter form 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 Compliance
2700 South Belmont Avenue
Indianapolis, IN 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 the 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, IDEM, OAQ, and the OES may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the 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 the "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 describes 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 the 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 No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-6865

City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 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 Compliance
2700 South Belmont Avenue
Indianapolis, IN 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 the "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 the 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 the 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 F097-13958-00107 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 Provision), 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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 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 the "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 FESOP 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 the "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 or the 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 or the 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 or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the 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 the 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 the "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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 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 the 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 the 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 the OES, any additional information identified as 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 Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2097

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

- (c) The Permittee may implement the 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 this source that are described in 326 IAC 2-8-15(b) through (d), without 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
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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2097

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

B.25 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

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (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.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 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Enforcement Section
2700 South Belmont Avenue
Indianapolis, IN 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ, and OES 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 the "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 the OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

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

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 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, and OES that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.14 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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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.15 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 the "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 Compliance
2700 South Belmont Avenue
Indianapolis, IN 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 the 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 the "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.16 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M1, with a maximum operating capacity of 13.41 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S1;
- (b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M2, with a maximum operating capacity of 22.44 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S4;
- (c) One (1) Heidelberg Sheetfed Lithographic Printing Press, approved for construction in 2007, identified as H1, with a maximum operating capacity of 21.97 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S2; and
- (d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as K-1, with a maximum operating capacity of 28.70 million square inches per hour (MMin²), exhausting at one (1) stack, identified as S3.

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

The amount of VOC delivered to the printing presses, identified as M1, M2, H1, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are less than ninety-two (92) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall satisfy the requirements of 326 IAC 2-8 (FESOP).

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

The amount of VOC delivered to the printing presses, identified as M1, M2, H1, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

- (a) The amount of single HAP delivered to the printing presses identified as M1, M2, H1, and K-1, plus the amount of single HAP used for clean-up of the printing presses shall be limited such that single HAP emitted is less than 8.0 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, H1, and K-1, plus the amount of combination of HAPs used for clean-up of the printing presses shall be limited such that combination of HAPs emitted is less than 20 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with Conditions D.1.1 and D.1.2 for VOC emissions shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor (based on EPA document "Draft Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing", EPA-HQ-OAR-2006-0536, July, 2006) for inks used on Presses M1, M2, H1, and K-1.

D.1.5 Hazardous Air Pollutants (HAPs)

Compliance with Condition D.1.3 for single HAP and combination of HAPs emissions shall be determined within 30 days of the end of each month based on the total single HAP usage and combination of HAPs usage for the most recent twelve (12) month period. The monthly single HAP and combination of HAPs emissions shall be based on the monthly usage of HAP containing materials, percent weight of HAPs in materials used, and shall assume a 95% volatile organic HAP retention factor (based on EPA document "Draft Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing", EPA-HQ-OAR-2006-0536, July, 2006) for inks used on Presses M1, M2, H1, and K-1.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3. 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 and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted (based on 95% retention factor for inks used on the presses) for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) one (1) natural gas fired boiler with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972;
- (b) one (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and
- (c) one (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.

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

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

D.2.1 Particulate [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heating), when total source maximum operating capacity rating in MMBtu/hour (Q) is less than 10 MMBtu/hr, the PM emission rate shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the PM emissions from the 6.695 MMBtu per hour boiler and the 2.760 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 1.2 MMBtu/hr heat input boiler, installed in 1992, shall be limited to 0.59 pounds per MMBtu heat input based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107

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 COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP No.: F097-13958-00107
 Facility: M1, M2, H1, K-1
 Parameter: VOC

- Limit: 1) The amount of VOC delivered to the printing presses, identified as M1, M2, H1, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press, based on 95% VOC retention factor for inks used on the presses, is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
- 2) The amount of VOC delivered to the printing presses, identified as M1, M2, H1, and K-1, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are ninety-two (92) tons or less per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall satisfy the requirements of 326 IAC 2-8 (FESOP).

YEAR: _____

Facility	Month	Column 1	Column 2	Column 1 + Column 2
		VOC Emissions	VOC Emissions	VOC Emissions
M1	Month 1			
M2				
H1				
K-1				
M1, M2, H1 and K-1				
M1	Month 2			
M2				
H1				
K-1				
M1, M2, H1 and K-1				
M1	Month3			
M2				
H1				
K-1				
M1, M2, H1 and K-1				

- 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
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP No.: F097-13958-00107
 Facility: M1, M2, H1, K-1
 Parameter: Single HAP and Total HAPs

Limit: 1) The amount of single HAP delivered to the printing presses identified as M1, M2, H1, and K-1, plus the amount of single HAP used for clean-up of the printing presses shall be limited such that single HAP emitted is less than 8.0 tons per twelve consecutive month period with compliance determined at the end of each month.

2) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, H1, and K-1, plus the amount of combination of HAPs used for clean-up of the printing presses shall be limited such that combination of HAPs emitted is less than 20 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 12 Month Total
Month 1						
Month 2						
Month 3						

- No deviation occurred in this quarter. Deviation/s occurred in this quarter.
 Deviation/s 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
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

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

Source Name: Shorewood Packaging Corporation of Indiana
 Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
 FESOP No.: F097-13958-00107

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

<p>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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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.

The following calculations are the Potential to Emit Calculations for the 4 presses on site at Shorewood. The PTE is based on historical data used previously in former permit application:

Throughput Info per Press

Press ID	Max Sheets per Hour	Max Image Size (in)	MMin ² /hr	MMin ² /year	Run time, % ¹	Run hours ¹	Wash time, % ¹	Wash hours ¹	IPA Usage, gal ²	Blanket Wash Usage, gal ²
M1	12000	40" x 27.94"	13.41	117482	39.10	2334.40	7.96	475.30	3377.55	984.50
M2	12000	51.19" x 36.53"	22.44	196571	36.58	2289.00	9.51	595.40	3218.60	1211.65
K1	15000	51.19" x 37.38"	28.70	251432	39.95	2512.80	9.47	595.80	3522.75	1240.80
H1	18000	29.53" x 41.34"	21.97	192491	38.54	2378.73	8.98	555.50	3372.97	1145.65

¹ Run and wash time data is from 2002 breakdown of hours used in a previous application. For H1, as a new press, run and wash values are estimated as an average of the other 3 presses.

² IPA and Blanket Wash usage is from 2002 data used in a previous application. For H1, as a new unit, material usage is estimated as an average of the other 3 presses' data.

Pollutant Information

Potential to Emit

Pollutant	Maximum Coverage	Density	Content	Flash Off (Less Incineration Deduction for Blanket Wash)	Emission (tpy) per Press ²			
	Ib/MMin ²	Ib/gal			M1	M2	K1	H1
Inks	2.63		VOC 28%	5%	0.85	1.32	1.85	1.37
			HAP - Cobalt 1.67%	5%	0.05	0.08	0.11	0.08
			HAP - Manganese 0.29%	5%	0.01	0.01	0.02	0.01
Coatings	3.92		VOC 6.15%	100%	5.54	8.67	12.11	8.94
			PM10		0.38	0.59	0.83	0.61
Spray Powder	0.0165							
IPA (Fountain solution)			6.5 VOC 99%	100%	15.95	14.50	15.79	15.40
Blanket Wash			6.9 VOC 100%	27%	1.35	1.58	1.61	1.51
			HAP - Glycol Ether 40%	27%	0.54	0.63	0.65	0.61

² Emission per press is pollutant info x mmin²/yr or lb/gal x run time data / 21

Total Potential to Emit (tpy)					
	<u>M1</u>	<u>M2</u>	<u>K1</u>	<u>H1</u>	<u>Total for presses</u>
VOC	23.67	26.07	31.35	27.22	108.32
HAP - Cobalt	0.05	0.08	0.11	0.08	0.32
HAP - Manganese	0.01	0.01	0.02	0.01	0.06
HAP - Glycol Ether	0.54	0.63	0.65	0.61	2.42
HAP - Combined	0.60	0.73	0.77	0.70	2.80
PM10	0.38	0.59	0.83	0.61	2.41

ε

uses' data

000 lb per ton

Insignificant Activities PTE¹, tpy

VOC	1.71
HAP	0.51
Glycol Ether	0.13
Methanol	0.00
Hexane	0.25
Hydroquinone	0.13
Hydrogen Fluoride	0.00
Folder/Gluers	1.81

¹PTE is copied from previous Technical Support Document for previous permit application