



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: October 25, 2007
RE: Cortegra / 163-24931-00183
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06



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New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

Cortegra
15220 Foundation Avenue
Evansville, Indiana 47725

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M163-24931-00183	
Issued by:	Issuance Date: October 25, 2007
<i>Original signed by Iryn Calilung for</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: October 25, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in condition A.1 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary lithographic and flexographic printing operation.

Source Address:	15220 Foundation Avenue, Evansville, Indiana 47725
Mailing Address:	419 S. Fulton Avenue, Evansville, Indiana 47708
General Source Phone Number:	812-429-1500
SIC Code:	2752 and 2759
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, approved for construction in 2007, exhausting to stack EF-8.
- (b) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P02, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (c) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P03, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (d) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (e) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (f) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including a water heater (identified as GWH-1), and rooftop HVAC units (identified as RTU-1 through RTU-17), approved for construction in 2007, having a total maximum heat input capacity of 4.82 MMBtu per hour.
- (h) Vessels storing hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (i) Emission units with the potential to emit less than five (5) pounds per hour or twenty-five (25) pounds per day of PM₁₀, NO_x, and SO_x, less than twenty-five (25) pounds per day of CO, less than three (3) pounds per hour or fifteen (15) pounds per day of VOC including the following: one (1) Heidelberg Platen Press used for paper slitting, scoring, and folding, with a maximum sheet size of 22" x 30", approved for construction in 2007, exhausting inside the building.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, M163-24931-00183, 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.5 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.6 Enforceability

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

B.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification

- (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.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice 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
- (c) 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 on or before the date it is due.

B.12 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 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.

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
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

- (a) All terms and conditions of permits established prior to M163-24931-00183 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 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

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

B.18 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 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a 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 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.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [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.

- (b) 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.21 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate 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, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 Performance Testing [326 IAC 3-6]

- (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.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

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.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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) or 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, 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]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (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
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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 on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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, 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, approved for construction in 2007, exhausting to stack EF-8.
- (b) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P02, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (c) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P03, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (d) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (e) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (f) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5(c), the Permittee shall not cause, allow, or permit the operation of the flexographic printing lines (identified as P04 through P06) unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
- (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the lithographic printing presses (identified as P01, P02, and P03).

D.1.3 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 the printing presses.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**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).

Company Name:	Cortegra
Address:	15220 Foundation Avenue
City:	Evansville, Indiana 47725
Phone #:	812-429-1500
MSOP #:	M163-24931-00183

I hereby certify that Cortegra is :

still in operation.

I hereby certify that Cortegra is :

no longer in operation.

in compliance with the requirements of MSOP M163-24931-00183.

not in compliance with the requirements of MSOP M163-24931-00183.

Authorized Individual (typed):
Title:
Signature:
Date:

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.

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

**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 PERM 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: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ 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 ____/____/20____ _____ 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 "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:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Cortegra
15220 Foundation Avenue
Evansville, Indiana 47725

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Cortegra, 15220 Foundation Avenue, Evansville, Indiana 47725, completed construction of the lithographic and flexographic printing operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 15, 2007 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M163-24931-00183, Plant ID No. 163-00183 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____

Name _____ (typed or printed)

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a New Source Construction and Minor Source
Operating Permit

Source Background and Description

Source Name:	Cortegra
Source Location:	15220 Foundation Avenue, Evansville, Indiana 47725
County:	Vanderburgh
SIC Code:	2752, 2759
Operation Permit No.:	M163-24931-00183
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed an application from Cortegra relating to the construction and operation of an offset lithographic printing operation and a flexographic printing operation.

New Emission Units and Pollution Control Equipment

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

- (a) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P01, with a maximum sheet size of 1,120 in² (28" x 40"), six print decks, a maximum line speed of 11,000 sheets per hour, approved for construction in 2007, exhausting to stack EF-8.
- (b) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P02, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (c) One (1) sheet fed, non-heat set, offset lithographic printing press, identified as P03, with a maximum sheet size of 1,120 in² (28" x 40"), two print decks, a maximum line speed of 8,000 sheets per hour, approved for construction in 2007, exhausting inside the building.
- (d) One (1) in-line, flexographic printing press, identified as P04, with a maximum print width of 7 inches, a maximum line speed of 450 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (e) One (1) in-line, flexographic printing press, identified as P05, with a maximum print width of 7 inches, a maximum line speed of 500 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.
- (f) One (1) in-line, flexographic printing press, identified as P06, with a maximum print width of 16 inches, a maximum line speed of 600 feet per minute, approved for construction in 2007, exhausting to stack EF-5. This unit is equipped with a UV Coating unit and Varnish Station.

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including a water heater (identified as GWH-1), and rooftop HVAC units (identified as RTU-1 through RTU-17), approved for construction in 2007, having a total maximum heat input capacity of 4.82 MMBtu per hour.
- (h) Vessels storing hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (i) Emission units with the potential to emit less than five (5) pounds per hour or twenty-five (25) pounds per day of PM₁₀, NO_x, and SO_x, less than twenty-five (25) pounds per day of CO, less than three (3) pounds per hour or fifteen (15) pounds per day of VOC including the following: one (1) Heidelberg Platen Press used for paper slitting, scoring, and folding, with a maximum sheet size of 22" x 30", approved for construction in 2007, exhausting inside the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

This is the first air approval issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
EF-8	P01	29.92	2.41	2,000	70.0
EF-5	P04, P05, P06	30.08	2.95	3,000	70.0

Recommendation

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

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

An application for the purposes of this review was received on June 15, 2007, with additional information received on June 22, 2007.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

Potential to Emit of the Source or Revision Before Controls

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	Potential to Emit (tons/yr)
PM	0.04
PM10	0.16
SO ₂	0.01
VOC	70.9
CO	1.74
NOx	2.07

HAPs	Potential to Emit (tons/yr)
Cumene	2.06
Xylene	2.06
Glycol Ethers	7.13
Other HAPs	0.29
Total	11.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) 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. A MSOP will be issued.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard and revoking the one-hour ozone standard in Indiana.

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate

PM10 emissions as surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section.

- (b) Volatile organic compounds (VOC) emissions and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (c) Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.04
PM10	0.16
SO ₂	0.01
VOC	70.9
CO	1.74
NOx	2.07
Single HAP	7.13
Combination HAPs	11.5

- (a) This new source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This new source is not a major stationary source because PM10 (used as a surrogate for PM2.5) is not emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the 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 per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart QQ (New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing) (326 IAC 12) are not included in this permit for this source because this source performs flexographic and lithographic printing, and does not perform rotogravure printing.
- (b) The requirements of 40 CFR 60, Subpart RR (New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) (326 IAC 12) are not included in this permit for this source because this source does not manufacture pressure sensitive tape and label materials.
- (c) The requirements of 40 CFR 60, Subpart VVV (New Source Performance Standards for Polymeric Coating of Supporting Substrates) (326 IAC 12) are not included in this permit for this source pursuant to 40 CFR 60.740(d)(3) because the operations at this source are web coating operations that print an image on the surface of the substrate and any coatings are applied on the same printing line that applies the image.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (e) The requirements of 40 CFR 63, Subpart KK (National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry) (326 IAC 20-18) are not included in this permit for this source because this source is not a major source of HAPs and is not taking limits pursuant to 40 CFR 63.820(a)(2) to become an area source.
- (f) The requirements of 40 CFR 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating) (326 IAC 20-65) are not included in this permit for this source because this source is not a major source of HAPs.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source will be constructed in 2007 in Vanderburgh County and is not in one of 28 listed source categories under 326 IAC 2-2. The potential to emit of all regulated pollutants is less 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

This source will be constructed in 2007 in Vanderburgh County. Vanderburgh County has been designated as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 U.S. EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the

potential to emit 100 tons per year of any regulated pollutant. Cortegra has an unlimited potential to emit of PM10 below 100 tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

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

This source is not a major source of HAPs; therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Vanderburgh County, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 436 IAC 2-6-5.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

This source is not a source of fugitive particulate matter emissions. Therefore, the requirements of 326 IAC 6-5 do not apply.

326 IAC 6.5 (Particulate Matter Limitations)

This source is located in Vanderburgh County. However, this source is not specifically listed in 326 IAC 6.5-8, and the source does not have the potential to emit 100 tons of particulate matter per year or actual particulate matter emissions of ten tons per year or more. Therefore, the requirements of 326 IAC 6.5 do not apply.

State Rule Applicability – Printing Presses (Including Fountain Solution and Cleaners)

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

The printing presses are expected to have 100% transfer efficiencies and are not expected to have particulate emissions. Therefore the requirements of 326 IAC 6-3 do not apply.

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

The printing presses (P01 through P06) will be constructed after January 1, 1980; however, each press is subject to another Article 8 rule. The lithographic presses (P01, P02, and P03) are subject to the requirements of 326 IAC 8-2-5, and the flexographic printing presses (P04, P05, and P06) are subject to 326 IAC 8-5-5. Therefore, these presses are not subject to the requirements of 326 IAC 8-1-6.

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

The printing presses will be constructed in Vanderburgh County after July 1, 1990. The flexographic printing presses (identified as P04, P05, and P06) do not have actual emissions of greater than fifteen (15) pounds of VOC per day; therefore, the flexographic presses are not subject to the requirements of 326 IAC 8-2. The lithographic presses (identified as P01, P02, and P03) have actual emissions of greater than fifteen (15) pounds of VOC per day and apply surface coating materials to paper; therefore, the lithographic presses are subject to the requirements of 326 IAC 8-2-5. Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line. Based on the Material Safety Data Sheets (MSDS) provided by the source for the coatings and inks used in P01, P02, and P03, this source is able to comply with 326 IAC 8-2-5.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This source will be constructed in Vanderburgh County after July 1, 1990, and will perform organic solvent degreasing activities. However, all of the solvents used at this source will be applied either manually or automatically at the printing presses. There are no cold cleaners, open top vapor degreasers, or conveyORIZED degreasers at this source. Therefore, there are no applicable requirements under 326 IAC 8-3.

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

This source will be constructed after November 1, 1980 in Vanderburgh County, and the source has the potential to emit greater than twenty-five (25) tons of VOC per year. Therefore, the flexographic printing lines are subject to the requirements of 326 IAC 8-5-5. Pursuant to 326 IAC 8-5-5(c), the Permittee shall not cause, allow, or permit the operation of the flexographic printing lines unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
- (b) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound per pound (five-tenths (0.5) kilogram (kg) of volatile organic compound per kg) of solids in the ink.

Pursuant to 326 IAC 8-5-5(d)(2), the flexographic printing lines are not subject to the capture system requirements in 326 IAC 8-5-5(e), because they will be constructed after July 1, 1990 in Vanderburgh County and do not have the potential to emit twenty-five (25) tons per year or more of VOC, each.

State Rule Applicability –Natural Gas Combustion

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

The natural gas-fired combustion units are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas-fired combustion units are not subject to the requirements of 326 IAC 7-1.1, because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

State Rule Applicability – Platen Press

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

The Platen Press is expected to have negligible particulate emissions (less than 0.551 pounds per hour). Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply to the Platen Press because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8 (Volatile Organic Compound Rules)

There are no materials containing VOCs used in the Platen Press (this press is not able to perform printing or coating operations). This press is only used for cutting, slitting, scoring, and folding of paper. Therefore, there are no VOC emissions from this unit and the unit is not subject to any rules under 326 IAC 8.

Conclusion

The construction and operation of this offset lithographic printing and flexographic printing operation shall be subject to the conditions of the New Construction and Minor Source Operating Permit 163-24931-00183.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion**

Company Name: Cortegra
Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP #: 163-24931-00183
Reviewer: ERG/SE
Date: September 10, 2007

Heat Input Capacity
MMBtu/hr
4.82

Potential Throughput
MMSCF/yr
41.4

Emission Factor (lb/MMSCF)	Pollutant					
	PM*	PM10*	SO ₂	NOx**	VOC	CO
Potential to Emit (tons/yr)	1.90	7.60	0.60	100	5.50	84.0
	0.04	0.16	0.01	2.07	0.11	1.74

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100
Insignificant Combustion**

Company Name: Cortegra
Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP #: 163-24931-00183
Reviewer: ERG/SE
Date: September 10, 2007

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential to Emit (tons/yr)	4.35E-05	2.48E-05	1.55E-03	3.73E-02	7.04E-05

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	1.03E-05	2.28E-05	2.90E-05	7.87E-06	4.35E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
VOC Emissions From Printing and Cleaning Cycles**

Company Name: Cortegra
Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP #: 163-24931-00183
Reviewer: ERG/SE
Date: September 10, 2007

According to information provided by the source, this source will spend six (6) hours per 8-hour shift in a printing cycle. The remaining two (2) hours per 8-hour shift will be used for a cleaning cycle. The printing cycles and cleaning cycles cannot occur simultaneously. The fountain solution can be run simultaneously with the lithographic printing presses. The worst case emission calculations below assume that there will be three (3) 8-hour shifts per day and 365 days per year, for a total of 8,760 hours per year.

1. Printing Cycle: 6,570 hrs/yr

Lithographic Press Emission Unit ID	Maximum Sheet Size (in ² /sheet)	Maximum Line Speed (sheets/hr)	Number of Print Decks	Maximum Ink Coverage per Print Deck (lbs of ink/in ²)	Maximum Coating Coverage per Print Deck (lbs of coating/in ²)	Worst Case Ink Weight % VOC	Worst Case Coating Weight % VOC	VOC Retention Factor for Ink (%)	PTE VOC (tons/yr) from Ink	PTE VOC (tons/yr) from Coating	Total PTE VOC (tons/yr)
P01	1120	11,000	6	3.14E-06	6.20E-07	21.0%	3.80%	95.0%	8.00	0.95	8.95
P02	1120	8,000	2	3.14E-06	N/A	21.0%	N/A	95.0%	1.94	N/A	1.94
P03	1120	8,000	2	3.14E-06	N/A	21.0%	N/A	95.0%	1.94	N/A	1.94
Total									11.9	0.95	12.8

Flexographic Press Emission Unit ID	Maximum Print Width (in)	Maximum Line Speed (ft/min)	Number of Print Decks	Maximum Ink Coverage per Print Deck (lbs of ink/ft length)	Maximum Coating Coverage per Print Deck (lbs of coating/ft length)	Worst Case Ink Weight % VOC	Worst Case Coating Weight % VOC	PTE VOC (tons/yr) from Ink	PTE VOC (tons/yr) from Coating	Total PTE VOC (tons/yr)	
P04	7.00	450	1	0.00028	0.00018	5.00%	3.96%	1.24	0.63	1.87	
P05	7.00	500	1	0.00028	0.00018	5.00%	3.96%	1.38	0.70	2.08	
P06	16.0	600	1	0.00028	0.00018	5.00%	3.96%	1.66	0.84	2.50	
Total									4.28	2.18	6.45

Emission Units	Material	Total Maximum Usage (gal/hr)	Pounds VOC per Gallon of Mat.	PTE VOC (tons/yr)
P01 through P03	Fountain Solution	0.31	6.52	6.69

The fountain solution is used to prep the equipment for printing and can be run simultaneously with the lithographic printing presses.

Methodology

PTE VOC (tons/yr) (P01 through P03 - ink) = Max Sheet Size (in²/sheet) x Max Line Speed (sheets/hr) x Number of Print Decks x Max Ink Coverage per Print Deck (lbs/in²) x Worst Case Ink Weight % VOC x (1-VOC Retention Factor %) x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P01 through P03 - coating) = Max Sheet Size (in²/sheet) x Max Line Speed (sheets/hr) x Number of Print Decks x Max Coating Coverage per Print Deck (lbs/in²) x Worst Case Coating Weight % VOC x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P04 through P06 - ink) = Max Line Speed (ft/min) x Number of Print Decks x Max Ink Coverage per Print Deck (lbs/ft) x Worst Case Ink Weight % VOC x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (P04 through P06 - coating) = Max Line Speed (ft/min) x Number of Print Decks x Max Coating Coverage per Print Deck (lbs/ft) x Worst Case Coating Weight % VOC x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs

PTE VOC (tons/yr) (Fountain Solution) = Maximum Usage (gal/hr) x Pounds VOC per Gallon of Mat. (lbs/gal) x 6,570 hrs/yr x 1 ton/2,000 lbs

2. Cleaning Cycle: 2,190 hrs/yr

Emission Units	Material	Maximum Usage (gal/hr)	Hours per Day (hrs/day)*	Pounds VOC per Gallon of Mat.	PTE VOC (tons/yr)
P01 through P03	Blanket/Roller Wash Pressmax 90A0	5.50	6.00	6.65	40.0
P01 through P03	Roller Wash Step R001	0.52	6.00	4.25	2.40
P01 through P03	Peerless Back Cylinder Cleaner	0.22	6.00	2.96	0.71
P01 through P03	Enviro Meter Cleaner	0.13	6.00	8.75	1.23
P04 through P06	Rubber Rejuvenator	0.05	6.00	7.58	0.42
Total					44.8

Methodology

PTE VOC (tons/yr) = Maximum Usage (gal/hr) x Pounds VOC per Gallon of Mat. (lbs/gal) x 2,190 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAP Emissions From Printing and Cleaning Cycles

Company Name: Cortegra
Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP #: 163-24931-00183
Reviewer: ERG/SE
Date: September 10, 2007

According to information provided by the source, this source will spend six (6) hours per 8-hour shift in a printing cycle. The remaining two (2) hours per 8-hour shift will be used for a cleaning cycle. The printing cycles and cleaning cycles cannot occur simultaneously. The fountain solution can be run simultaneously with the lithographic printing presses. The worst case emission calculations below assume that there will be three (3) 8-hour shifts per day and 365 days per year, for a total of 8,760 hours per year.

1. Printing Cycle: 6,570 hrs/yr

Emission Unit ID	Maximum Print Width (in)	Maximum Line Speed (ft/min)	Number of Print Decks	Maximum Coating Coverage per Print Deck (lbs of coating/ft)	Worst Case Coating Weight % Glycol Ether	PTE Glycol Ether (tons/yr)
P04	7.00	450	1	0.00018	0.50%	0.08
P05	7.00	500	1	0.00018	0.50%	0.09
P06	16.0	600	1	0.00018	0.50%	0.11
Total						0.27

The coatings and inks used in P01, P02, and P03 do not contain any HAPs.
The inks used in P04, P05, and P06 do not contain any HAPs.

Material	Density (lbs/gal)	Total Maximum Usage (gal/hr)	Weight % 2-Butoxyethanol	PTE 2-Butoxyethanol (tons/yr)
Fountain Solution	7.76	0.31	85.0%	6.77

The fountain solution is used to prep the equipment for printing and can be run simultaneously with the lithographic printing presses.

Methodology

PTE HAP (tons/yr) (P04 through P06) = Maximum Line Speed (ft/min) x Maximum Coating Coverage per Print Deck (lbs of coating/ft) x Weight % HAP x 60 min/hr x 6,570 hrs/yr x 1 ton/2,000 lbs
PTE HAP (tons/yr) (Fountain Solution) = Maximum Usage (gal/hr) x Density (lbs/gal) x Weight % HAP x 6,570 hrs/yr x 1 ton/2,000 lbs

2. Cleaning Cycle: 2,190 hrs/yr

Emission Units	Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Cumene	Weight % Xylene	Weight % Trichloroethylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Glycol Ethers	PTE Cumene (tons/yr)	PTE Xylene (tons/yr)	PTE Trichloroethylene (tons/yr)	PTE Toluene (tons/yr)	PTE Methyl Isobutyl Ketone (tons/yr)	PTE Glycol Ethers (tons/yr)
P01 through P03	Blanket/Roller Wash Pressmax 90A0	6.84	5.50	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	2.06	2.06	0.00	0.00	0.00	0.00
P04 through P06	Rubber Rejuvenator	7.58	0.05	0.00%	0.00%	30.0%	20.0%	10.0%	20.00%	0.00	0.00	0.13	0.08	0.04	0.08
Total										2.06	2.06	0.13	0.08	0.04	0.08

The Enviro Meter Cleaner, Peerless Back Cylinder Cleaner, and the Roller Wash Step R001 do not contain any HAPs.

Methodology

PTE HAP (tons/yr) = Density (lbs/gal) x Maximum Usage (gal/hr) x Weight % HAP x 2,190 hrs/yr x 1 ton/2,000 lbs

Total HAPs 4.45

**Appendix A: Emission Calculations
Emissions From Printing Presses**

Company Name: Cortegra
Address: 15220 Foundation Avenue, Evansville, Indiana 47725
MSOP #: 163-24931-00183
Reviewer: ERG/SE
Date: September 10, 2007

Unlimited Potential to Emit (tons/yr)

	PM	PM10	SO ₂	NO _x	VOC	CO	Single HAP**	HAPs
Natural Gas Combustion	0.04	0.16	0.01	2.07	0.11	1.74	3.73E-02	0.04
Lithographic Presses	--	--	--	--	12.8	--	0.00	0.00
Flexographic Presses	--	--	--	--	6.45	--	0.27	0.27
Fountain Solution/Cleaners	--	--	--	--	51.5	--	6.85	11.2
Platen Press*	Negligible	Negligible	--	--	--	--	--	--
Total	0.04	0.16	0.01	2.07	70.9	1.74	7.13	11.5

*The platen press is used for paper slitting, scoring, and folding and is expected to have negligible PM/PM10 emissions.

**The single HAP with the highest emissions from natural gas combustion is hexane.

The single HAP with the highest emissions from the flexographic presses is glycol ether.

The single HAP with the highest emissions from the fountain solution/cleaners is 2-Butoxyethanol, which is a glycol ether.

The single HAP with the highest total emissions is glycol ether. The total PTE glycol ether is 7.13 tons/yr.