



DATE: January 15, 2008

TO: Interested Parties / Applicant

RE: Multi Packaging Solutions - Indiana / M 097-25153-00401

FROM: Patrick N. Carroll, Deputy Director
Department of Public Works

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 501, Indianapolis, IN 46204, **within fifteen (15) calendar days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures



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



Minor Source Operating Permit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY AND CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Multi Packaging Solutions - Indiana
2020 Production Drive
Indianapolis, Indiana 46241**

(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.

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

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.: M 097-25153-00401	
Issued by:	Issuance Date:
Patrick N. Carroll, Deputy Director Department of Public Works	Expiration Date:



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 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 printing operation.

Source Address:	2020 Production Drive, Indianapolis, Indiana 46241
Mailing Address:	2020 Production Drive, Indianapolis, IN 46241
General Source Phone Number:	317-241-2020
SIC Code:	2752
County Location:	Marion
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 Nonattainment New Source Review 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) Komori, L640 6 Color Sheetfeed Offset Lithographic Press, identified as K1, installed in 1996, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Komori, L540 5 Color Sheetfeed Offset Lithographic Press, identified as K2, installed in 1997, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) Komori, LS640 6 Color Sheetfeed Offset Lithographic Press, identified as K3, installed in 2005, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) Komori, LS40 8 Color Sheetfeed Offset Lithographic Press, identified as K4, installed in 2006, with a maximum line speed of 627.76 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (e) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:

Unit description	Max Heat input capacity (MMBtu/hr)	Number of Units	Combined Max Heat Input Capacity (MMBtu/hr)	potential natural Gas Usage (scf/hr ²)
Natural gas fired comfort heat units	0.23	8	1.848	1848
Natural gas fired comfort heat units	0.15	10	1.540	1540
Natural gas fired comfort heat units	0.08	2	0.160	160
Natural gas fired comfort heat units	0.30	1	0.300	300
	Total	21	3.848	3848

- (g) Cold cleaning dip tanks throughout the source identified as Emission Unit ID Cold Cleaner. Annual consumption of mineral spirits do not exceed 145 gallons per year. Equipped with remote reservoirs. [326 IAC 8-3-2]

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 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, M 097-25153-0401, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and OES, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

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

B.7 Duty to Provide Information

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

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

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual 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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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 and OES on or before the date it is due.

B.10 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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

- (a) All terms and conditions of permits established prior to M 097-25153-0401 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 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.13 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 OES 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
and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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 and OES on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as being needed to process the application.

B.14 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
and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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.15 Source Modification Requirement

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

B.16 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, and OES 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.17 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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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.18 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.19 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 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 and OES, 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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(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 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 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 and OES, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 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.15 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [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
and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, 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) Komori, L640 6 Color Sheetfeed Offset Lithographic Press, identified as K1, installed in 1996, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Komori, L540 5 Color Sheetfeed Offset Lithographic Press, identified as K2, installed in 1997, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) Komori, LS640 6 Color Sheetfeed Offset Lithographic Press, identified as K3, installed in 2005, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) Komori, LS40 8 Color Sheetfeed Offset Lithographic Press, identified as K4, installed in 2006, with a maximum line speed of 627.76 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.

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

There are no applicable requirements included for these emission units.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) Twenty-one (21) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:
- (g) Cold cleaning dip tanks throughout the source identified as Emission Unit ID Cold Cleaner. Annual consumption of mineral spirits do not exceed 145 gallons per year. [326 IAC 8-3-2]

(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.2.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

**INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

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

Source Name: Multi Packaging Solutions-Indiana
Source Address: 2020 Production Drive, Indianapolis, Indiana 46241
Mailing Address: 2020 Production Drive, Indianapolis, IN 46241
MSOP Permit No.: M 097-25153-0401

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 Notification
- 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
and
INDIANAPOLIS OFFICE of ENVIROMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Multi Packaging Solutions-Indiana
Address:	2020 Production Drive
City:	Indianapolis, Indiana 46241
Phone #:	317-241-2020
MSOP #:	M 097-25153-0401

I hereby certify that Multi Packaging Solutions-Indiana is : still in operation.
 no longer in operation.
I hereby certify that Multi Packaging Solutions-Indiana is : in compliance with the requirements of MSOP M 097-25153-0401.
 not in compliance with the requirements of MSOP M 097-25153-0401.

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

And
City of Indianapolis Office of Environmental Services

**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 ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

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

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

COMPANY: _____ 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

PAGE 1 OF 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:

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

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Multi Packaging Solutions - Indiana
Source Location:	2020 Production Drive, Indianapolis, IN 46241
County:	Marion
SIC Code:	2752
Operation Permit No.:	M 097- 25153-00401
Permit Reviewer:	Warner Myron Waters

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a MSOP application from Multi Packaging Solutions - Indiana relating to the operation of a stationary printing operation.

The source has been operating under the previous Source Specific Operating Agreement (SSOA) S 097-14322-00401. On August 17, 2007, IDEM, OAQ and OES received a letter from the source requesting a MSOP.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Komori, L640 6 Color Sheetfeed Offset Lithographic Press, identified as K1, installed in 1996, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Komori, L540 5 Color Sheetfeed Offset Lithographic Press, identified as K2, installed in 1997, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) Komori, LS640 6 Color Sheetfeed Offset Lithographic Press, identified as K3, installed in 2005, with a maximum line speed of 510 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) Komori, LS40 8 Color Sheetfeed Offset Lithographic Press, identified as K4, installed in 2006, with a maximum line speed of 627.76 feet per minute, and a maximum printing width of 40.5 inches, using no controls, and exhausting to the inside of the building.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:

Unit description	Max Heat input capacity (MMBtu/hr)	Number of Units	Combined Max Heat Input Capacity (MMBtu/hr)	potential natural Gas Usage (scf/hr ²)
Natural gas fired comfort heat units	0.23	8	1.848	1848
Natural gas fired comfort heat units	0.15	10	1.540	1540
Natural gas fired comfort heat units	0.08	2	0.160	160
Natural gas fired comfort heat units	0.30	1	0.300	300
	Total	21	3.848	3848

- (b) Cold cleaning dip tanks throughout the source identified as Emission Unit ID Cold Cleaner. Annual consumption of mineral spirits do not exceed 145 gallons per year. Equipped with remote reservoirs. [326 IAC 8-3-2]

Existing Approvals

The source has been operating under the previous SSOA S 097-14322-00401 issued on June 27, 2001.

Enforcement Issue

There are no enforcement actions pending. The emission units listed under unpermitted Emission Units and Control Devices did not meet minimum permitting thresholds.

Recommendation

The staff recommends to the Administrator that the MSOP be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete MSOP application for the purposes of this review was received on August 27, 2007. Additional data was received on October 19 and October 23, 2007.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	82.16
CO	1.42
NO _x	1.69

HAPs	Unrestricted Potential Emissions (tons/yr)
Single HAP (Xylene)	Negligible
Combined HAPS	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year and the potential emissions of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit

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.”

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
K1	0	0	0	19.89	0	0	Negligible
K2	0	0	0	14.68	0	0	
K3	0	0	0	19.89	0	0	
K4	0	0	0	24.78	0	0	
Combustion units and Degreasing	Negligible			2.92	1.42	1.69	Negligible
Total Emissions	0	0	0	82.16	1.42	1.69	

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	Non-Attainment
PM-10	Attainment
SO ₂	Maintenance attainment
NO ₂	Attainment
8-hour Ozone*	Attainment
CO	Attainment
Lead	Attainment

Note*: On November 8, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Clark, Floyd, Elkhart, St. Joseph, LaPorte, Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone.

On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, VOC emissions and NO_x 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.

- (b) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability Entire Source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. 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.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	82.16
CO	1.42
NO _x	1.69
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

Federal Rule Applicability

- (a) Affected facilities subject to 40 CFR 60 Subpart QQ applicability are publication rotogravure printing presses. All units used by the source are either offset lithography, heatset lithography, nonheatset lithography, or letterpress printing presses. None of these presses use a gravure cylinder such as is defined in Subpart QQ, so none of the facilities at this source are publication rotogravure printing presses. 40 CFR 60 Subpart QQ is not included in this permit for this source.
- (b) No other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are included in this permit.
- (c) This source is not subject to the requirements of 40 CFR 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry. This standard applies to major sources of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wide-web flexographic printing presses are operated. The printing presses at this source are not subject to the NESHAP, because they are not publication, product and packaging rotogravure printing presses, or wideweb flexographic printing presses, and the source is not major for single HAP or combined HAPs.
- (d) This source is not subject to the requirements of 40 CFR 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry. This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc.

takes place. The presses located at the source are not subject to this NESHAP because the source is not a major source for single HAP or combined HAPs. Web coating in lithography is specifically exempted by § 63.3300(c).

State Rule Applicability – Entire Source

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

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

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

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each attainment criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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

The PTE of the operation of four (4) Lithographic Press machines is less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source, located in Marion County, is not required to have an Operating Permit under 326 IAC 2-7 (Part 70 Permit Program) and does not have the potential to emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 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.

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (New facilities; general reduction requirements)

This rule applies to new facilities constructed after January 1, 1980 with potential emissions of VOC of 25 tons per year or more. There are no emission units with the potential to emit greater than 25 tons per year or more located at this source, therefore 326 IAC 8-1-6 is not applicable

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

326 IAC 8-3-5 (Cold cleaner degreaser operation and control) does not apply to this source because the Cold cleaner degreaser tanks are equipped with remote solvent reservoirs. 326 IAC 8-3-5 applies to cold cleaning degreasing tanks without remote solvent reservoirs.

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

This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing facilities existing as of November 1, 1980, which have potential VOC emissions of greater than one hundred (100) tons per year, or new facilities after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more VOC. The lithographic presses covered in this permit are not subject to the Graphic Arts Operations 326 IAC 8-5-5 because this rule only applies to flexographic and rotogravure presses.

Conclusion

The operation of this stationary printing operation shall be subject to the conditions of the MSOP M 097-25153-00401.

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
K1	510.055	28.3	130293.0

Product Name	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
nk: osf ecopure HP Process yellow SF Suncure SF1246	2	24.0%	5.000%	130293	1.56
	0.5	3.5%	100.000%	130293	1.14
Press max 91UV	0.18	100.0%	100.000%	130293	11.73
		0.0%	0.000%	130293	0.0000
Press max 399	0.04	100.0%	100.000%	130293	2.61
		0.0%	0.000%	130293	0.00
Pressmax 1101	0.0002	29.7%	100.000%	130293	0.0039
		0.0%	0.000%	130293	0.0000
PRESS Max 04	0.05	87.5%	100.000%	130293	2.85
		0.0%	0.000%	130293	0.00

Total VOC Emissions =	19.89 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
K2	510.055	28.3	130293.0

Product Name	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
nk: osf ecopure HP Process yellow SF Suncure SF1246	2	24.0%	5.000%	130293	1.56
	0.5	3.5%	100.000%	130293	1.14
Press max 97S2	0.1	100.0%	100.000%	130293	6.51
		0.0%	0.000%	130293	0.00
Press max 399	0.04	100.0%	100.000%	130293	2.61
		0.0%	0.000%	130293	0.00
Pressmax 1101	0.0002	29.7%	100.000%	130293	0.00
		0.0%	0.000%	130293	0.00
PRESS Max 04	0.05	87.5%	100.000%	130293	2.85
		0.0%	0.000%	130293	0.00

Total VOC Emissions =	14.68 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

(Source -OQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
K3	510.055	28.3	130293.0

Product Name	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
nk: osf ecopure HP Process yellow SF Suncure SF1246	2	24.0%	5.000%	130293	1.56
	0.5	3.5%	100.000%	130293	1.14
Press max 91UV	0.18	100.0%	100.000%	130293	11.73
		0.0%	0.000%	130293	0.00
Press max 399	0.04	100.0%	100.000%	130293	2.61
		0.0%	0.000%	130293	0.00
Pressmax 1101	0.0002	29.7%	100.000%	130293	0.00
		0.0%	0.000%	130293	0.00
PRESS Max 04	0.05	87.5%	100.000%	130293	2.85
		0.0%	0.000%	130293	0.00

Total VOC Emissions =	19.89 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
K4	627.76	28.25	160361

Product Name	Maxium Coverage '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
nk: osf ecopure HP Process yellow SF Suncure SF1246	2.50000	24.0%	5.000%	160361	2.41
	0.50000	3.5%	100.000%	160361	1.41
Press max 91UV	0.18000	100.0%	100.000%	160361	14.43
		0.0%	0.000%	160361	0.00
Press max 399	0.03600	100.0%	100.000%	160361	2.89
		0.0%	0.000%	160361	0.00
Pressmax 1101	0.00600	29.7%	100.000%	160361	0.14
		0.0%	0.000%	160361	0.00
PRESS Max 04	0.05000	87.5%	100.000%	160361	3.51
		0.0%	0.000%	160361	0.00

Total VOC Emissions =	24.78 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Parts washer

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

Parts Washer Description:

One (1) parts washer with 34 gallon capacity of solvent.

Solvent Data:

Solvent Name	Manufacturer	Product Density (lb/gal) ⁽¹⁾	VOC Content (lb/gal)
Safety-Kleen Premium Gold Solvent	Safety-Kleen	6.6	6.6

Potential Emissions:

Max. Annual Solvent Usage [gal/yr] ⁽²⁾	Max. Hourly Solvent Usage [gal/hr] ⁽³⁾	Potential VOC Emissions [lb/hr] ⁽⁴⁾	Potential VOC Emissions [tpy] ⁽⁵⁾
855	0.098	0.647	2.83

Additional Information:

- (1) Product Density [lb/gal] = Specific Gravity x 8.34 lb/gal = 0.795 x 8.34
(2) Cornerstone took the typical annual solvent usage (570 gallons) x 150% to estimate a maximum annual solvent usage.
(3) Max. Hourly Solvent Usage [gal/hr] = Max. Annual Solvent Usage [gal/yr] / 8,760 hr/yr
(4) Potential VOC Emissions [lb/hr] = Max. Hourly Solvent Usage [gal/hr] x VOC Content [lb/gal]
(5) Potential VOC Emissions [tpy] = Potential VOC Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

Appendix A: Emissions Calculations

Emissions Natural Gas Fired Unit

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 4624
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

Natural Gas Fired Unit Specifications

Unit Descriptions	Maximum Heat Input Capacity Per Unit [MMBtu/hr]	Number of Units	Combined Maximum Heat Input Capacity [MMBtu/hr]	Potential Natural Gas Usage [scf/hr] ⁽¹⁾
Natural Gas Fired Comfort Heat Units	0.23	8	1.848	1,848
Natural Gas Fired Comfort Heat Units	0.15	10	1.540	1,540
Natural Gas Fired Comfort Heat Units	0.08	2	0.160	160
Natural Gas Fired Comfort Heat Unit	0.30	1	0.300	300
TOTAL		21	3.848	3,848

Natural Gas Fired Unit Potential Emissions

Pollutant	Emission Factor [lb/MMscf] ⁽²⁾	Potential Emissions [lb/hr] ⁽³⁾	Potential Emissions [tpy] ⁽⁴⁾
NO _x	100	0.38	1.69
CO	84	0.32	1.42
VOC	5.5	0.02	0.09
SO ₂	0.6	0.00	0.01
PM/PM ₁₀	7.6	0.03	0.13
Benzene	2.1E-03	0.00	0.00
Dichlorobenzene	1.2E-03	0.00	0.00
Formaldehyde	7.5E-02	0.00	0.00
Hexane	1.8E+00	0.01	0.03
Toluene	3.4E-03	0.00	0.00
Lead	5.0E-04	0.00	0.00
Cadmium	1.1E-03	0.00	0.00
Chromium	1.4E-03	0.00	0.00
Manganese	3.8E-04	0.00	0.00
Nickel	2.1E-03	0.00	0.00
Combined HAPs	NA	0.01	0.03

Notes and Methodology

(1) Potential Natural Gas Usage [scf/hr] = Combined Maximum Heat Input Capacity [MMBtu/hr] x 1,000,000 Btu/MMBtu / 1,000 Btu/scf
 Assumed heating value of natural gas to be 1,000 Btu/scf.

(2) Emission factors are from AP-42, Tables 1.4-1 and 1.4-2. Utilized the NO_x and CO emission factors for an uncontrolled small boiler (i.e. < 100 MMBtu/hr heat input).

All emission factors are for normal firing. The PM/PM₁₀ emission factor is filterable and condensable particulate combined.

The HAPs above include the 5 organic HAPs and 5 metal HAPs with the highest emission factors.

(3) Potential Emissions [lb/hr] = Total Potential Natural Gas Usage [scf/hr] / 1,000,000 scf/MMscf x Emission Factor [lb/MMscf]

(4) Potential Emissions [tpy] = Potential Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

Appendix A: Emissions Calculations

Total Printing Press VOC

Company Name: Multi Packaging Solutions-Indiana
Address City IN Zip: 2020 Production Drive Indianapolis IN 46241
Permit Number: 097-25153-0401
Reviewer: Warner Myron Waters
Date: 09-26-2007

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Emissions (TONS/YEAR)
K4	627.76	28.25	24.78
K3	510.055	28.3	19.89
K2	510.055	28.3	14.68
K1	510.055	28.3	19.89

	VOC	CO	NO _x
Combustion units and Degreasing	2.92	1.42	1.69

82.16 Total VOC Emissions