



DATE: September 6, 2007
TO: Interested Parties / Applicant
RE: Sport Graphics / F097-25162-00318
FROM: Felicia A. Robinson
Administrator
City of Indianapolis
Office of Environmental Services

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures



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

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



September 6, 2007

Bill Luke
Sport Graphics
3423 Park Davis Circle
Indianapolis, Indiana 46236

Certified Mail: 7007 0710 0005 3965 9924

Re: F097-25162-00318
First Administrative Amendment to
F097-21383-00318

Dear Mr. Luke:

Sport Graphics was issued a Federally Enforceable Operating Permit (FESOP), F097-21383-00318, on March 15, 2006, for the operation of a stationary lithographic printing operation, located at 3423 Park Davis Circle, Indianapolis, Indiana, 46236.

A letter requesting an Administrative Amendment to the permit was received on August 20, 2007. The source requested approval to construct a new printing press identified as EU15, and remove two printing presses, identified as EU12 and EU14. Based on information provided by the source and verified by OES, the potential to emit of EU15 is 20.46 tons per year of VOC, and 7.94 tons per year of combined HAPs (see Attachment A, page 1 through 2).

Pursuant to 326 IAC 2-8-10(a)(14), as a modification that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, and will not result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3, the addition of EU15 is an Administrative Amendment.

The current limited PTE of VOC is less than 100 tons per year. The addition of press EU15 will not affect the FESOP limits currently contained in the permit. Therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows (the bold language is new language that has been added, and the language with a line through it has been taken out):

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

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

The Permittee owns and operates a Stationary Printing Operation.

~~Authorized individual:~~ ~~President/CEO~~
Source Address: 3423 Park Davis Circle
Indianapolis, Indiana 46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, Indiana 46236
SIC Code: 2759



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

Source Location Status: Marion County
~~Nonattainment for ozone under the 8-hour standard~~
~~Nonattainment for PM2.5~~
Nonattainment for 8-hour ozone and PM2.5
Attainment for all other criteria pollutants.

Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act

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

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

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- ~~(g) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.~~
- ~~(h) (g)~~ (g) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.
- ~~(i) One (1) Komori Offset Lithographic 2 Color Press, identified as EU14, installed January 15, 2002 with a maximum line speed of 427.8 feet per minute, and a maximum printing width of 28 inches, using no controls, and exhausting inside the building.~~
- (h) One (1) Komori Offset Lithographic 4 color press, identified as EU15, approved to construct in 2007, with a maximum line speed of 661 feet per minute, and a**

maximum printing width of 40 inches, using no controls, and exhausting inside the building.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- ~~(g) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.~~
- ~~(h) (g) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.~~
- ~~(i) One (1) Komori Offset Lithographic 2 Color Press, identified as EU14, installed January 15, 2002, with a maximum line speed of 427.8 feet per minute, and a maximum printing width of 28 inches, using no controls, and exhausting inside the building.~~
- (h) One (1) Komori Offset Lithographic 4 color press, identified as EU15, approved to construct in 2007, with a maximum line speed of 661 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.**

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-8]

- (a) The VOC usage in EU2 and EU10 shall each be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month such that 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

- (b) The combined VOC usage in EU2, EU5, EU7, EU8, EU9, EU10, ~~EU12~~, EU13 and ~~EU14~~ **EU15** shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

D.1.2 Hazardous Air Pollutants (HAP's) [326 IAC 2-8][326 IAC 2-4.1]

- (a) Total Individual HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, ~~EU12~~, EU13 and ~~EU14~~ **EU15** shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply.

- (b) The total combined HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, ~~EU12~~, EU13 and ~~EU14~~ **EU15** shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply.

4. Section B.13, Emergency Provisions, and the Emergency Occurrence reporting form have been changed to reflect the new telephone and fax numbers for IDEM. OES telephone and fax numbers were also included.

B.13 Emergency Provisions [326 IAC 2-8-12]

...

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section) —
Facsimile Number: 317-233-5967

**Telephone No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-6865**

**City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274**

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865**

and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2209

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

...

5. All reporting forms have replaced references to EU12 and EU14 with EU15.

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

FESOP Quarterly Report

Source Name: Sport Graphics
Source Address: 3423 Park Davis Circle, Indianapolis, IN 46236
Mailing Address: 3423 Park Davis Circle, Indianapolis, IN 46236
FESOP No.: 097-21383-00318
Facilities: EU2, EU5, EU7, EU8, EU9, EU10, ~~EU12~~, EU13 and ~~EU14~~-**EU15**

...

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

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

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

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

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

7. IDEM and OES have decided to include the following updates to further address and clarify the permit terms and the terms of the conditions. This includes changes to the following C conditions: Overall Source Limit and Actions Related to Noncompliance Demonstrated by a Stack Test.

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

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

- (a) Pursuant to 326 IAC 2-8:

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

8. Condition C.7 has been corrected because all conditions and requirements in a FESOP are federally enforceable.

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

...

- (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.~~

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

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

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator

Attachments

mmd

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



FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

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

**Sport Graphics
3423 Park Davis Circle
Indianapolis, Indiana 46236**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-21383-00318	
Original signed by, Felicia Robinson Manager of Environmental Planning Office of Environmental Services	Issuance Date: March 15, 2006 Expiration Date: March 14, 2011
First Administrative Amendment: F097-25162-00318	
Issued by: ORIGINAL SIGNED BY Felicia A. Robinson Manager of Environmental Planning Indianapolis Office of Environmental Services	Issuance Date: September 6, 2007 Expiration Date: March 14, 2011



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

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(l)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
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- B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-8-6]
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- B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
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Stratospheric Ozone Protection

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- D.1.3 Volatile Organic Compounds (VOC)
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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a Stationary Printing Operation.

Source Address:	3423 Park Davis Circle Indianapolis, Indiana 46236
Mailing Address:	3423 Park Davis Circle Indianapolis, Indiana 46236
SIC Code:	2759
Source Location Status:	Nonattainment for 8-hour ozone and PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (g) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.

- (h) One (1) Komori Offset Lithographic 4 color press, identified as EU15, approved to construct in 2007, with a maximum line speed of 661 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

- (a) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) 1.25 MMBtu/ hr Web Press Gas Dryer, identified as EU 11, and venting to stack Number 1.
- (b) Paved and unpaved roads and parking lots with public access.

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

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

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

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.
- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-6865

City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the

Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which

cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.
- (2) If IDEM, OAQ, and OES upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

and

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

and

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the

use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

and

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

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

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

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

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

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

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

and

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.
- (b) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.
- (c) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (d) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (e) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.
- (f) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.
- (g) One (1) Komori Offset Lithographic 6 Color Press, identified as EU13, installed January 15, 2002, with a maximum line speed of 505.56 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.
- (h) One (1) Komori Offset Lithographic 4 color press, identified as EU15, approved to construct in 2007, with a maximum line speed of 661 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting inside the building.

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-8]

- (a) The VOC usage in EU2 and EU10 shall each be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month such that 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) The combined VOC usage in EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15 shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

D.1.2 Hazardous Air Pollutants (HAP's) [326 IAC 2-8][326 IAC 2-4.1]

- (a) Total Individual HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15 shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply.
- (b) The total combined HAP usage in EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 do not apply

Compliance Determination Requirements [326 IAC 8-1-2][326 IAC 8-1-4]

D.1.3 Volatile Organic Compounds (VOC)

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

D.1.4 Hazardous Air Pollutants (HAPs)

- (a) Compliance with the HAP usage limitations contained in Conditions D.1.2 shall be determined using formulation data supplied by the coating manufacturer.
- (b) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total individual hazardous air pollutant usage and total combined hazardous air pollutant usage for the most recent month. HAP's to be included in this determination for individual HAP's are all of those which have the potential of exceeding 10 tons per year. All HAP's shall be included in this determination for combined HAP's.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on daily 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 or month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each day (or month); and
 - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total HAP usage for each month; and
 - (5) The weight of HAP's emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

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

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

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

Source Name: Sport Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, IN 46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, IN 46236
FESOP No.: F097-21383-00318

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Phone: 317-233- 0178
Fax: 317-233- 6865
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2209**

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

Source Name: Sport Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, IN 46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, IN 46236
FESOP No.: F097-21383-00318

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Sport Graphics
 Source Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 Mailing Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 FESOP No.: F097-21383-00318
 Facility: EU2 and EU10
 Parameter: VOC Emissions
 Limit: Less than 25 tons per 12 consecutive month period with compliance determined at the end of each month for each unit

Quarter: _____ YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
Month 1	EU 2	EU10	EU2	EU10	EU2	EU10
Month 2						
Month 3						

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sport Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, IN 46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, IN 46236
FESOP No.: F097-21383-00318
Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15
Parameter: VOC Emissions
Limit: Less than 100 tons per consecutive 12 month period with compliance determined at the end of each month for the units combined

Quarter _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sport Graphics
 Source Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 Mailing Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 FESOP No.: F097-21383-00318
 Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15
 Parameters: Individual HAP Emissions
 Limits: Less than 10 tons per 12 consecutive month period with compliance determined at the end of each month for individual HAPs

Quarter: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Single Hap	Single Hap	Single Hap
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sport Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, IN 46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, IN 46236
FESOP No.: F097-21383-00318
Facilities: EU2, EU5, EU7, EU8, EU9, EU10, EU13 and EU15
Parameters: Combined HAP Emissions
Limits: Less than 25 tons per 12 consecutive month period with compliance determined at the end of each month for Combined HAPs

Quarter: _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

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

Source Name: Sport Graphics
 Source Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 Mailing Address: 3423 Park Davis Circle
 Indianapolis, IN 46236
 FESOP No.: F097-21383-00318

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A: Emission Calculations

Company Name: Sport Graphics
 Address: 3423 Park Davis Circle, Indianapolis, Indiana 46236
 Permit Number: F097-25162-00318
 Permit Reviewer: Monica Doyle
 Date: August 23, 2007

New Press Specifications

Press Number	Sheetfed Offset Lithographic Press Description	No. of Color Units	Max Print Length (inches)	Max Print Width (inches)	Max Print Area (in ²)	Max Press Speed (sheets/hr)	¹ Max Throughput (MMin ² /hr)	² Max Throughput (MMin ² /yr)
EU15	Komori, 4-color	4	28	40	1120	17,000	19.04	166,790.4

Methodology

¹ Maximum Press Throughput For Sheet-fed Presses (MMin²/hr) = Maximum Print Area (in²/sheet) * Maximum Press Speed (sheet/hr) / 1,000,000 (in²/MMin²)

² Maximum Press Throughput For Sheet-fed Presses (MMin²/yr) = Maximum Throughput (Mmin²/hr) * 8,760 (hr/yr)

Attachment A: Emission Calculations

Company Name: Sport Graphics
 Address: 3423 Park Davis Circle, Indianapolis, Indiana 46236
 Permit Number: F097-25162-00318
 Permit Reviewer: Monica Doyle
 Date: August 23, 2007

New Press Emissions

Press ID	EU15	Press Description	Komori, 4-color			
<i>VOC Emissions from Inks and Coatings</i>						
Product Name	Product Type	⁽¹⁾ Maximum Coverage (lbs/MMin ²)	⁽²⁾ VOC Content (wt%)	⁽³⁾ Flash Off (%)	Throughput MMin ² /Year	⁽⁴⁾ Potential VOC Emissions (tpy)
Inks (Braden Sutphin)	Ink	1.5	19.80%	5%	166,790	1.24
Coating (Braden Overprint Varnish)	Coating	0.05	3.51%	5%	166,790	0.01
						1.25

VOC Emissions from Fountain Solution and Press Cleaning

Product Name	Product Type	⁽¹⁾ Maximum Coverage (lbs/MMin ²)	VOC Content (wt%)	⁽³⁾ Flash Off (%)	⁽⁴⁾ Potential VOC Emissions (tpy)
Solvent Blend S-1100	Blanket Wash	0.15	100%	100%	12.84
Autowash 6000	Blanket Wash	0.06	99.69%	100%	5.17
Fountain Concentrate 2451	Fountain Solution Additive	0.03	19.10%	100%	0.465
Alkaless P	Fountain Solution Additive	0.01	60.87%	100%	0.735
					19.20

HAP Emissions

Product Name	HAP Constituent	HAP Content (wt%)	Potential HAP Emissions (tpy)
Solvent Blend S-1100	Methylene Chloride	30%	3.85
	Xylene	30%	3.85
Fountain Concentrate 2451	Ethylene Glycol	10%	0.24
			7.94

Methodology

⁽¹⁾ Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners represents a max for each printer

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

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

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

⁽⁵⁾ HAP PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x HAP Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Maximum % Operation Time