



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: January 14, 2008

RE: Grafcor, Inc. / 177-25422-00066

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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100 North Senate Avenue
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Minor Source Operating Permit OFFICE OF AIR QUALITY

Grafcor, Inc.
601 NW Fifth Street
Richmond, Indiana 47374

(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 177-25422-00066	
Issued by:  Iryn Callilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 14, 2008 Expiration Date: January 14, 2013

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in 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 lithographic printing press operation.

Source Address:	601 NW Fifth Street, Richmond, Indiana 47374
Mailing Address:	601 NW Fifth Street, Richmond, IN 47374
General Source Phone Number:	(765) 966-7030
SIC Code:	2752
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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 source consists of the following emission units and pollution control devices:

- (a) One (1) 64-inch-sheet-fed-offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of four hundred twenty seven (427) feet per minute, exhausting to stack GNP-EV-1.
- (b) One (1) 60-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV-1.
- (c) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, approved for construction in 1996, exhausting to stack GNP-EV-1.
- (d) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, identified as LUK 106 and their associated auxiliary equipments, approved for construction in 1998, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV-1.

* Note: All four (4) presses are non-heatset printing presses.

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 177-25422-00066, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

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

B.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

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

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

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

- (a) All terms and conditions of permits established prior to M 177-25422-00066 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 shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

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

B.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

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, 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

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 IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 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, 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.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
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) 64-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of four hundred twenty seven (427) feet per minute, exhausting to stack GNP-EV-1.
- (b) One (1) 60-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV- 1.
- (c) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, approved for construction in 1996, exhausting to stack GNP-EV-1.
- (d) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, identified as LUK 106 and their associated auxiliary equipments, approved for construction in 1998, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV-1.

* Note: All four (4) presses are non-heatset printing presses.

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

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

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

Pursuant to CP 177-5032-00066, issued on July 24, 1996, the VOC usage including clean up solvent delivered to the 64-inch press shall not exceed two (2) tons per month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 not applicable.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the printing presses.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC 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, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Volatile Organic Compounds (VOC) Emissions

Compliance with condition D.1.1 shall be determined within 30 days of the end of each month. Pursuant to CP 177-5032-00066, issued on July 24, 1996, the volatile content of the overcoat and cleaning solvents shall be multiplied by a 100% emission factor to obtain VOC emissions and the volatile content of each of the printing inks shall be multiplied by 5% emission factor to obtain the VOC emission.

The VOC emissions are calculated using the following equation:

$$\text{VOC (tons/year)} = \text{Max. Coverage} * \text{VOC Content} * \text{Flash Off} * \text{Throughput} / 2,000(\text{lb/ton})$$

Where:

Max. Coverage	=	Maximum Coverage (lb/MMIn ²)
VOC Content	=	Weight percent VOC minus water
Flash Off	=	5% (for Inks and 100% for others)
Throughput	=	Maximum throughput per year (MMIn ² /year)
VOC	=	VOC Emissions (tons/yr)

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

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 (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
 - (2) The total VOC usage for each month.
- (b) 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 shall be submitted to the address 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 Compliance Data Section

Quarterly Report

Source Name: Grafcor, Inc.
Source Address: 601 NW Fifth Street, Richmond, Indiana 47374
Mailing Address: 601 NW Fifth Street, Richmond, IN 47374
MSOP Permit No.: M 177-25422-00066
Source: The 64-inch-sheet-fed offset lithographic printing press
Pollutant: VOC Usage/Emissions
Limit: 2 tons/month

Year: _____

Month	VOC Usage/Emissions (tons/month)

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Grafcor, Inc.
Address:	601 NW Fifth Street
City:	Richmond, Indiana 47374
Phone #:	(765) 966-7030
MSOP #:	M 177-25422-00066

I hereby certify that Grafcor, Inc. is:	<input type="checkbox"/> still in operation.
	<input type="checkbox"/> no longer in operation.
I hereby certify that Grafcor, Inc. is:	<input type="checkbox"/> in compliance with the requirements of MSOP M177-25422-00066.
	<input type="checkbox"/> not in compliance with the requirements of MSOP M177-25422-00066.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 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

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**

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

Source Name: Grafcor, Inc.
Source Address: 601 NW Fifth Street, Richmond, Indiana 47374
Mailing Address: 601 NW Fifth Street, Richmond, IN 47374
MSOP Permit No.: M 177-25422-00066

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**

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

Source Background and Description

Source Name:	Grafcor, Inc.
Source Location:	601 NW Fifth Street, Richmond, Indiana 47374
County:	Wayne
SIC Code:	2752
Operation Permit No.:	M 177-25422-00066
Permit Reviewer:	Renee Traivaranon

The Office of Air Quality (OAQ) has reviewed an application from Grafcor, Inc. relating to the operation of lithographic printing presses.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) 64-inch-sheet-fed-offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of four hundred twenty seven (427) feet per minute, exhausting to stack GNP-EV-1.
- (b) One (1) 60-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, and their associated auxiliary equipments, approved for construction in 1996, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV-1.
- (c) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, approved for construction in 1996, exhausting to stack GNP-EV-1.
- (d) One (1) 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater, identified as LUK.106 and their associated auxiliary equipments, approved for construction in 1998, with a maximum line speed of two hundred fifty (250) feet per minute, exhausting to stack GNP-EV-1.

* Note: All four (4) presses are non-heatset printing presses.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) CP 177-5032-00066 issued on July 24, 1996; and
- (b) CP 177-9702-00066 issued on June 30, 1998.

All conditions from previous permits were incorporated into this permit except one 77-inch-sheet-fed offset lithographic printing press with in-line emulsion overcoater. This emissions unit was not incorporated into this permit because the company representative stated that there were only four (4) presses, not five (5) presses, at the source.

Enforcement Issue

IDEM is aware that the source did not obtain a proper operating permit. IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on October 18, 2007.

Emission Calculations

See Appendix A of this document for detailed calculations (Appendix A, pages 1 through 2).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	88.6
CO	Negligible
NO _x	Negligible
Single HAP	0.4 (Xylene)
Combination HAPs	0.5

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(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 not subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (b) Wayne County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Wayne County has been classified as attainment or unclassifiable for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	88.6
CO	Negligible
NO _x	Negligible
Single HAP	0.4 (Xylene)
Combination HAPs	0.5

This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
 - (1) This source is not subject to the requirements of 40 CFR 60, Subpart QQ, Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing. This standard applies to each publication rotogravure printing press, that commenced construction, modification or reconstruction after October 28, 1980. The four (4) lithographic printing presses are not subject to the NSPS, because they are not rotogravure printing presses.
 - (2) This source is not subject to the requirements of 40 CFR 60, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing. This standard applies to each publication rotogravure printing press used to print or coat flexible vinyl or urethane products, that commenced construction, modification or reconstruction after January 18, 1983. The four (4) lithographic printing presses are not subject to these requirements because they are not rotogravure printing press and they are used for printing paper.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR 61, and 40 CFR 63) included in the permit for this source.
 - (1) 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 source 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 the source is not a major source for Hazardous Air Pollutants (HAPs); the potential to emit of single HAP is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year.

- (2) 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, because source is not a major source for Hazardous Air Pollutants (HAPs); the potential to emit of single HAP is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year.

State Rule Applicability – Entire Source

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

This source is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1), and no attainment pollutant is emitted at a rate of 250 tons per year or greater. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is located in Wayne County, has the potential to emit of each criteria pollutant of less than hundred (100) tons per year and the potential to emit lead of less than four (4) tons per year. Therefore, the requirements of 326 IAC 2-6 do 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:

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6.5 (Particulate Matter Limitations except Lake County)

The source, located in the Wayne county, is not subject to the requirements of 326 IAC 6.5 (Particulate Matter Limitations except Lake County), because the potential to emit of PM is less than one hundred (100) tons per year and the actual emissions of PM is less than ten (10) tons per year.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations: Applicability)

The source is not subject to the requirements of 326 IAC 7-1.1, because the potential to emit of all emission units are less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

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

The source is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because the printing operation at this source is not packaging rotogravure, publication rotogravure, and flexographic printing operation.

326 IAC 10-1 (Nitrogen Oxides Control)

The source is not subject to 326 IAC 10 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd Counties.

State Rule Applicability – Individual Facilities

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

The lithographic printing press is exempt from the requirements of 326 IAC 6-3 because the potential to emit of particulate emission is less than 0.551 pounds per hour.

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

The four (4) lithographic printing presses are not subject to 326 IAC 8-2-5, (Paper Coating Operations). This rule establishes limitations for web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate. The paper coating operation at this source is a sheet-fed printing process, it is not a web coating and it has less than 100% saturation, it is known as offset lithography or offset printing, therefore, this rule does not apply.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

This rule applies to facilities constructed after January 1980, which have potential VOC emissions of 25 tons or more per year, and are not regulated by any other provisions of 326 IAC 8.

- (a) The potential to emit VOC of the 64-inch press is greater than 25 tons per year, but the Permittee limits the total VOC usage for this press to less than 25 tons per year. This limit was specified order in CP 177-5032-00066 issued on July 24, 1996. Therefore, this printing press is not subject to the requirements of 326 IAC 8-1-6.
- (b) The potential to emit VOC of each of the other three (3) presses; one (1) 60-inch press, two (2) 77-inch, is less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

Conclusion

The operation of this lithographic printing operation shall be subject to the conditions of the Minor Source Operating Permit No. 177-25422-00066.

Appendix A: Emissions Calculations
 VOC From Printing Press Operations

Company Name: Grafco, Inc.
 Address City IN Zip: 601 NW Fifth Street, Richmond, Indiana 47374
 Permit Number: M177-25422-00066
 Reviewer: Renee Traivanon
 Date: January 7, 2008

THROUGHPUT Press I.D.	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	Mmin ² /YEAR
KBA 301922 - 64 inch	427	12	64	60	8760	1000000
Harris 145 E/134 D - 60 inch	260	12	60	60	8760	1000000
Harris 77 Desgn. - 77 inch	260	12	77	60	8760	1000000
Harris 77 LUK 106 Offset - 77 inch	260	12	77	60	8760	1000000

Ink Name Press Id	Maximum Coverage lbs/Mmin ²	Weight % Volatiles*	Flash Off %	Throughput Mmin ² / Year	Tons	Tons
					2000 lbs	Year
All Press Inks						
KBA 301922 - 64 inch	3.4	19.8%		172363	2000	2.90
Harris 145 E/134 D - 60 inch	3.4	19.8%		121414	2000	1.59
Harris 77 Desgn. - 77 inch	3.4	19.8%		121414	2000	2.04
Harris 77 LUK 106 Offset - 77 inch	3.4	19.8%		121414	2000	2.04

Worst Case Emulsion Overcoat		Density (lb/gal)	Weight % Volatiles	Gallons per Unit	Units per Hour	VOC (lbs/hr)	VOC (tons/yr)
Worst Case - All Overcoat A653N/W2	Press Id						
KBA 301922 - 64 inch	7.18	4.2%	100.00%	19.68	0.080	0.352	
Harris 145 E/134 D - 60 inch	7.18	4.2%	100.00%	10.80	0.080	0.351	
Harris 77 Desgn. - 77 inch	6.94	4.5%	100.00%	13.86	0.080	0.351	
Harris 77 LUK 106 Offset - 77 inch				47.50	0.325	1.423	

Cleaning Solvents		Density (lb/gal)	Weight % Volatiles	Gallons per Unit	Units per Hour	VOC (lbs/hr)	VOC (tons/yr)
Worst case - All Blanket/Wash CR1-232	Press Id						
KBA 301922 - 64 inch	7.42	100%	0.00650	19.68	0.080	0.352	
Harris 145 E/134 D - 60 inch	7.42	100%	0.001000	10.80	0.080	0.351	
Harris 77 Desgn. - 77 inch	7.42	100%	0.00780	13.86	0.080	0.351	
Harris 77 LUK 106 - 77 inch	6.94	100%	0.001000	47.50	0.325	1.423	

Total:		VOC (tons/yr)	
KBA 301922		29.24	
Harris 145E/134 D		16.21	
Harris 77 Desgn.		20.70	
Harris 77 Desgn.		22.43	
Grand Total:		88.6	

*VOC = Maximum Coverage pounds per Mmin² * Weight % volatiles (weight % of water & organics * weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
 METHODOLOGY

Throughput = Maximum 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: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. NON HEAT SET FLASH OFF = 5% AND ALL OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%

HAP Emission Calculations

Company Name: Grafcor, Inc.
 Address City IN Zip: 601 NW Fifth Street, Richmond, Indiana 47374
 Permit Number: M177-25422-00066
 Permit Reviewer: Renee Traivaranon
 Date: January 7, 2008

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Xylene	Glycol Ethers Emissions (ton/yr)	Xylene Emissions (ton/yr)
Press: KBA 301922 - 64 Inch								
Worst-case Ink	8.50	0.400	19.68	0.05	0.00%	0.00%	0.00	0.00
Worst-case Emulsion Overcoat A553N-W2	8.70	0.845	19.68	1.00	0.00%	0.00%	0.00	0.00
All Blanket-Wash CRI-232	7.42	0.00055	19.68	1.00	2.00%	30.00%	0.01	0.11
Press: Harris 145E/134 D - 60 inch								
Worst-case Ink	8.50	0.400	10.80	0.05	0.00%	0.00%	0.00	0.00
Worst-case Emulsion Overcoat A553N-W2	8.70	0.845	10.80	1.00	0.00%	0.00%	0.00	0.00
All Blanket-Wash CRI-232	7.42	0.001	10.80	1.00	2.00%	30.00%	0.01	0.11
Press: Harris 77 Desgn. - 77 Inch								
Worst-case Ink	8.50	0.400	13.86	0.05	0.00%	0.00%	0.00	0.00
Worst-case Emulsion Overcoat A553N-W2	8.70	0.845	13.86	1.00	0.00%	0.00%	0.00	0.00
All Blanket-Wash CRI-232	7.42	0.00078	13.86	1.00	2.00%	30.00%	0.01	0.11
Press: Harris 77 Desgn. - 77 Inch								
Worst-case Ink	8.50	0.400	13.86	0.05	0.00%	0.00%	0.00	0.00
Worst-case Emulsion Overcoat A553N-W2	8.70	0.845	13.86	1.00	0.00%	0.00%	0.00	0.00
All Blanket-Wash CRI-232	7.42	0.00078	13.86	1.00	2.00%	30.00%	0.01	0.11

Total State Potential Emissions	Total HAPs	
	Total: (tons/yr):	0.422
	(tons/hr):	0.096

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Flash-off