



DATE: April 9, 2008

TO: Interested Parties / Applicant

RE: Pratt Corporation / M097-25795-00548

FROM: Timothy J. Method  
Environmental Coordinator

## 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 501, 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](http://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](http://indygov.org/dpw)



April 9, 2008

Mr. Steve Fischer  
Pratt Corporation  
3035 N. Shadeland Avenue  
Suite 100  
Indianapolis, IN 46226

Certified Mail: 7007 0710 0005 3965 6787

Re: First Notice Only Change  
097-25795-00548 to  
MSOP No.: M097-20182-00548

Dear Mr. Fischer:

Pratt Corporation was issued a Minor Source Operating Permit (MSOP) M097-20182-00548 on February 28, 2005 for the operation of a screen and digital printing facility located at 3035 N. Shadeland Avenue, Indianapolis, Indiana. The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) received an application on December 19, 2007, relating to the construction of four (4) new digital presses, removing four screen (4) printing presses, removing manual presses, removing one (1) digital press, and correcting and revising emission unit descriptions as well as emissions calculations (VOC and HAPs) listed in the initial MSOP. Pursuant to the provisions of 326 IAC 2-6.1-6(d)(13), the MSOP, M097-20182-00548, is hereby revised as described in the enclosed Technical Support Document (TSD). Please find attached a copy of the revised permit.

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 Anh-tuan Nguyen at (317) 327-2353.

Sincerely,

Original Signed by

Timothy J. Method  
Environmental Coordinator  
Department of Public Works

Attachments: Revised Permit and TSD  
FAR/an

cc: Air Permits-2  
Air Compliance – Matt Mosier  
IDEM, OAQ – Mindy Hahn  
US EPA Region 5  
Marion County Health Dept.



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TDD 327-5186  
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**MINOR SOURCE OPERATING PERMIT  
INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Pratt Corporation  
3035 North Shadeland Avenue  
Indianapolis, Indiana 46226**

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

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

Operation Permit No.: MSOP 097-20182-00548	
Original Signed by John B. Chavez  John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: February 28, 2005  Expiration Date: February 28, 2010
First Notice Only Change: 097-25795-00548	Conditions affected: Entire Permit
Issued by:  Original Signed by  Timothy J. Method, Environmental Coordinator Department of Public Works	Issuance Date: April 9, 2008  Expiration Date: February 28, 2010



**Department of Public Works  
Office of Environmental Services**  
  
2700 Belmont Avenue | 317-327-2234  
Indianapolis, IN 46221 | Fax 327-2274  
TDD 327-5186  
indygov.org/dpw

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## SECTION A SOURCE SUMMARY

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

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The Permittee owns and operates screen and digital printing.

Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226  
Mailing Address: P.O. Box 18179, Indianapolis, Indiana 46218  
General Source Phone: (317) 524-3217  
SIC Code: 2759  
County Location: Marion County  
Source Location Status: Nonattainment for PM2.5  
Attainment for all other criteria pollutants.  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Nonattainment NSR  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 1, installed in 2005, using no control, and exhausting to stacks SP1-1A&B through SP1-5A&B respectively, with a combined maximum throughput of 15,750 sfh (square feet per hour).
- (b) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour).
- (c) One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).
- (d) One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).
- (e) One digital printing press, identified as Vutek, installed in 2004, using no control, and exhausting to stack Digital, with a maximum throughput of 199.87 sfh (square feet per hour).
- (f) One (1) Inca Turbo digital printing press, identified as Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (g) One (1) Inca Turbo digital printing press, identified as Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).

- (h) One (1) Spyder digital printing press, identified as Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (i) One (1) Colorspan digital printing press, identified as Macdermid, installed in 2007, using no control, with a maximum throughput of 399.6 sfh (square feet per hour).

**SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**B.1 Permit No Defense [IC 13]**

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This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**B.2 Definitions**

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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.3 Effective Date of the Permit [IC 13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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This permit, M097-20182-00548, 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

**B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and 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, Indiana 46204-2251

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

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

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 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] [IC13-17-3-2][IC 13-30-3-1]**

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- 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, and 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to 326 IAC 2-6.1-6(d)(3):

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, Air Permits, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

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.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**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 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

**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 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.5 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 OES  
Air Enforcement  
2700 South Belmont Ave.  
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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ, 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 OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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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 IDEM commissioner or the U.S. EPA.

## Compliance Monitoring Requirements

### C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

## Record Keeping and Reporting Requirements

### C.9 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 IDEM, OAQ, and OES 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 IDEM, OAQ, and OES 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.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

- (c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not 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

## EMMISIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 1, installed in 2005, using no control, and exhausting to stacks SP1-1A&B through SP1-5A&B respectively, with a combined maximum throughput of 15,750 sfh (square feet per hour).
- (b) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour)
- (c) One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).
- (d) One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).
- (e) One digital printing press, identified as Vutek, installed in 2004, using no control, and exhausting to stack Digital, with a maximum throughput of 199.87 sfh (square feet per hour).
- (f) One (1) Inca Turbo digital printing press, identified as Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (g) One (1) Inca Turbo digital printing press, identified as Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour)
- (h) One (1) Spyder digital printing press, identified as Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (i) One (1) Colorspan digital printing press, identified as Macdermid, installed in 2007, using no control, with a maximum throughput of 399.6 sfh (square feet per hour)

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

There are no applicable conditions for these facilities.

Any change or modification which would increase VOC emission potential to greater than 25 tons per year, a single HAP emission potential to greater than 10 tons per year, or a combination of HAPs emission potential to greater than 25 tons per year may require prior approval from IDEM, OAQ before such change can occur.

Pursuant to 326 IAC 8-2-1(a)(4), the VOC actual emissions from the screen and digital press operations are each less than 15 pounds per day, thus rendering 326 IAC 8-2-5 not applicable.

**Indiana Department of Environmental Management  
Office of Air Quality  
Compliance Data Section  
and  
Indianapolis OES  
Air Compliance**

**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).

<b>Company Name:</b>	<b>Pratt Corporation</b>
<b>Address:</b>	<b>3035 North Shadeland Avenue</b>
<b>City:</b>	<b>Indianapolis, Indiana 46226</b>
<b>Phone #:</b>	<b>(317) 524-3217</b>
<b>MSOP #:</b>	<b>097-20182-00548</b>

I hereby certify that Pratt Corporation is

- still in operation.  
 no longer in operation.

I hereby certify that Pratt Corporation is

- in compliance with the requirements of MSOP 097-20182-00548.  
 not in compliance with the requirements of MSOP 097-20182-00548.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
**Compliance Data Section**  
FAX NUMBER – 317-233-6865  
and  
**Indianapolis OES**  
**Air Compliance**  
FAX NUMBER – 317-327-2274

**MALFUNCTION REPORT**

PAGE 1 OF 2

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? \_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ? \_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES? \_\_\_\_\_, 25 TONS/YEAR VOC ? \_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ? \_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ? \_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? \_\_\_\_\_, 25 TONS/YEAR FLUORIDES ? \_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ? \_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? \_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? \_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? \_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

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

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

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

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: \_\_\_\_\_

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

**\*SEE PAGE 2**

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

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

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

Technical Support Document (TSD) for a Notice Only Change (NOC) to a  
Minor Source Operating Permit (MSOP)

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Pratt Corporation</b>
<b>Source Location:</b>	<b>3035 Shadeland Avenue, Indianapolis, Indiana 46226</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2759</b>
<b>Operation Permit No.:</b>	<b>M097-20182-00548</b>
<b>Operation Permit Issuance Date:</b>	<b>February 28, 2005</b>
<b>Notice Only Change No.:</b>	<b>097-25795-00548</b>
<b>Permit Reviewer:</b>	<b>Anh-tuan Nguyen</b>

On December 19, 2007, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) received an application from Pratt Corporation related to a modification to an existing screen and digital printing operation.

<b>Existing Approvals</b>
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The source was issued MSOP No. M097-20182-00548 on February 28, 2005.

<b>County Attainment Status</b>
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The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005.

Basic Nonattainment effective April 5, 2005 for PM<sub>2.5</sub>.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Fugitive Emissions</b>
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- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

<b>Status of the Existing Source</b>
--------------------------------------

The table below summarizes the potential to emit of the entire source, prior to the proposed Notice Only Change, after consideration of all enforceable limits established in the effective permits:

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Highest Single HAP
Five (5) screen printing presses / SP1-1A&B through SP1-5A&B	0.0	0.0	0.0	0.0	6.53	0.0	0.10	0.10 ethyl benzene
Five (5) screen printing presses / SP2-1A&B through SP2-5A&B	0.0	0.0	0.0	0.0	7.13	0.0	0.10	0.11 ethyl benzene

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP
One (1) screen printing press / SP-PatII	0.0	0.0	0.0	0.0	1.29	0.0	0.02	0.02 ethyl benzene
One (1) screen printing press / SP-PatLAB	0.0	0.0	0.0	0.0	1.29	0.0	0.02	0.02 ethyl benzene
One (1) screen printing press / SP-Eclipse1AB	0.0	0.0	0.0	0.0	0.68	0.0	0.01	0.01 ethyl benzene
One (1) screen printing press / SP-M&R	0.0	0.0	0.0	0.0	1.55	0.0	0.02	0.02 ethyl benzene
One (1) screen printing press / SP - Conquest	0.0	0.0	0.0	0.0	4.64	0.0	0.07	0.07 ethyl benzene
Six (6) screen printing presses / SP3-1A&B through SP3-5A&B	0.0	0.0	0.0	0.0	6.42	0.0	0.10	0.10 ethyl benzene
One (1) digital printing press / Vutek	0.0	0.0	0.0	0.0	6.96	0.0	6.22	6.22 glycol ether
One (1) digital printing press / Inca	0.0	0.0	0.0	0.0	0.00	0.0	0.0	0.0
Screen Chemicals	0.0	0.0	0.0	0.0	6.63	0.0	0.91	0.91 glycol ether
Fugitive Emissions	0.0	0.0	0.0	0.0	0.00	0.0	0.0	0.0
Total PTE of Entire Source	0.0	0.0	0.0	0.0	43.13	0.0	8.69	6.22

negl. = negligible  
 These emissions are based upon MSOP M097-20182-00548 issued on February 28, 2005.

**Description of Proposed Notice Only Change**

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application, submitted by Pratt Corporation on December 19, 2007, relating to the construction of four (4) new digital presses, removing four screen (4) printing presses, removing manual presses, removing one (1) digital press, and correcting and revising emission unit descriptions as well as emissions calculations (VOC and HAPs) listed in the initial MSOP M097-20182-00548, issued on February 28, 2005 (see Proposed Changes section). The four (4) new digital presses were constructed without obtaining the proper permit.

The following is a list of unpermitted emission units and pollution control devices:

- (a) One (1) Inca Turbo digital printing press, identified as Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (b) One (1) Inca Turbo digital printing press, identified as Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (c) One (1) Spyder digital printing press, identified as Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (d) One (1) Colorspan digital printing press, identified as Macdermid, installed in 2007, using no control, with a maximum throughput of 399.6 sfh (square feet per hour).

**Enforcement Issues**

IDEM and OES is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM and OES is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP Notice Only Change**

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Notice Only Change (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP
One (1) screen printing press / M&R Processor 1	0.0	0.0	0.0	0.0	1.99	0.0	0.0	0.0
One (1) screen printing press / M&R Processor 2	0.0	0.0	0.0	0.0	2.21	0.0	0.0	0.0
One (1) screen printing press / SP - Conquest	0.0	0.0	0.0	0.0	0.67	0.0	0.0	0.0
One (1) screen printing press / Thieme	0.0	0.0	0.0	0.0	4.18	0.0	0.0	0.0
Vutek One (1) digital printing press / Vutek	0.0	0.0	0.0	0.0	5.00	0.0	4.33	4.33 glycol ether
One (1) digital printing press / Turbo 1	0.0	0.0	0.0	0.0	0.08	0.0	0.08	0.08 glycol ether
One (1) digital printing press / Turbo 2	0.0	0.0	0.0	0.0	0.08	0.0	0.08	0.08 glycol ether
One (1) digital printing press / Spyder	0.0	0.0	0.0	0.0	0.10	0.0	0.10	0.10 glycol ether
One (1) digital printing press / Macdermid	0.0	0.0	0.0	0.0	3.45	0.0	3.45	3.45 glycol ether
Manual Operations (Cleaning & Screen Preparation)	0.0	0.0	0.0	0.0	7.42	0.0	2.44	0.92 glycol ether
Total PTE of Proposed Notice Only Change	0.0	0.0	0.0	0.0	25.18	0.0	10.48	4.33

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

This MSOP is being revised through a MSOP Notice Only Change pursuant to 326 IAC 2-6.1-6(d)(13), because the addition of the four (4) digital presses is considered a modification that adds emission unit or units of the same type that are already permitted and will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 and 326 IAC 2-3.

**PTE of the Entire Source After Issuance of the MSOP Notice Only Change**

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to after the Proposed Notice Only Change (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP
Five (5) screen printing presses / SP1-1A&B through SP1-5A&B One (1) screen printing press / M&R Processor 1	0.0	0.0	0.0	0.0	<del>6.53</del> <b>1.99</b>	0.0	0.0	0.10 ethyl benzene
Five (5) screen printing presses / SP2-1A&B through SP2-5A&B One (1) screen printing press / M&R Processor 2	0.0	0.0	0.0	0.0	<del>7.13</del> <b>2.21</b>	0.0	0.0	0.11 ethyl benzene
One (1) screen printing press / SP-PatII	0.0	0.0	0.0	0.0	<del>1.29</del>	0.0	0.0	0.02 ethyl benzene
One (1) screen printing press / SP-PatLAB	0.0	0.0	0.0	0.0	<del>1.29</del>	0.0	0.0	0.02 ethyl benzene
One (1) screen printing press / SP-Eclipse1AB	0.0	0.0	0.0	0.0	<del>0.68</del>	0.0	0.0	0.01 ethyl benzene
One (1) screen printing press / SP-M&R	0.0	0.0	0.0	0.0	<del>1.55</del>	0.0	0.0	0.02 ethyl benzene
One (1) screen printing press / SP - Conquest	0.0	0.0	0.0	0.0	<del>4.64</del> <b>0.67</b>	0.0	0.0	0.07 ethyl benzene
Six (6) screen printing presses / SP3-1A&B through SP3-5A&B One (1) screen printing press / Thieme	0.0	0.0	0.0	0.0	<del>6.42</del> <b>4.18</b>	0.0	0.0	0.10 ethyl benzene
One (1) digital printing press / Vutek	0.0	0.0	0.0	0.0	<del>6.96</del> <b>5.00</b>	0.0	<b>4.33</b>	<del>6.22</del> <b>4.33</b> glycol ether
One (1) digital printing press / Inca	0.0	0.0	0.0	0.0	<del>0.00</del>	0.0		
Screen Chemicals Manual Operations (Cleaning & Screen Preparation)	0.0	0.0	0.0	0.0	<del>6.63</del> <b>7.42</b>	0.0	<b>2.44</b>	<del>0.94</del> <b>0.92</b> glycol ether
One (1) digital printing press / Turbo 1	0.0	0.0	0.0	0.0	<b>0.08</b>	0.0	<b>0.08</b>	<b>0.08</b> glycol ether
One (1) digital printing press / Turbo 2	0.0	0.0	0.0	0.0	<b>0.08</b>	0.0	<b>0.08</b>	<b>0.08</b> glycol ether
One (1) digital printing press / Spyder	0.0	0.0	0.0	0.0	<b>0.10</b>	0.0	<b>0.10</b>	<b>0.10</b> glycol ether
One (1) digital printing press / Macdermid	0.0	0.0	0.0	0.0	<b>3.45</b>	0.0	<b>3.45</b>	<b>3.45</b> glycol ether

Process/Emission Unit	Potential To Emit of the Entire Source to after the Proposed Notice Only Change (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP
Total PTE of Entire Source	0.0	0.0	0.0	0.0	<del>43.13</del> <b>25.18</b>	0.0	<del>8.69</del> <b>10.48</b>	<b>4.33</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of the Notice Only Change (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP
One (1) screen printing press / M&R Processor 1	0.0	0.0	0.0	0.0	1.99	0.0	0.0	0.0
One (1) screen printing press / M&R Processor 2	0.0	0.0	0.0	0.0	2.21	0.0	0.0	0.0
One (1) screen printing press / SP - Conquest	0.0	0.0	0.0	0.0	0.67	0.0	0.0	0.0
One (1) screen printing press / Thieme	0.0	0.0	0.0	0.0	4.18	0.0	0.0	0.0
Vutek One (1) digital printing press / Vutek	0.0	0.0	0.0	0.0	5.00	0.0	4.33	4.33 glycol ether
Manual Operations (Cleaning & Screen Preparation)	0.0	0.0	0.0	0.0	7.42	0.0	2.44	0.92 glycol ether
One (1) digital printing press / Turbo 1	0.0	0.0	0.0	0.0	0.08	0.0	0.08	0.08 glycol ether
One (1) digital printing press / Turbo 2	0.0	0.0	0.0	0.0	0.08	0.0	0.08	0.08 glycol ether
One (1) digital printing press / Spyder	0.0	0.0	0.0	0.0	0.10	0.0	0.10	0.10 glycol ether
One (1) digital printing press / Macdermid	0.0	0.0	0.0	0.0	3.45	0.0	3.45	3.45 glycol ether
Total PTE of Entire Source	0.0	0.0	0.0	0.0	25.18	0.0	10.48	4.33
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

#### MSOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included for this proposed revision, because the source does not use rotogravure printing.
- (b) There are no other New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63.820, Subpart KK (326 IAC 20-18-1), are not included in the permit, since Pratt Corporation does not operate a rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and is not a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating, 40 CFR 63.3280, Subpart KK (326 IAC 20-65-1), are not included in the permit, since Pratt Corporation does not operate a web coating line and is not a major source of HAPs.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

#### Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

### **State Rule Applicability Determination**

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Notice Only Change Section above.

- (c) 326 IAC 2-1.1-5 (Non-attainment New Source Review)  
Marion County has been designated as nonattainment for PM<sub>2.5</sub>. According to an EPA guidance memo dated April 5, 2005, PM<sub>10</sub> is to be utilized as a surrogate for PM<sub>2.5</sub> until the EPA can promulgate the PM<sub>2.5</sub> implementation rule. PM<sub>10</sub> emissions, and therefore PM<sub>2.5</sub> emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. Therefore, this source is not subject to nonattainment new source review requirements for PM<sub>2.5</sub> emissions. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the presses is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
  - (2) 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.
- (g) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
This source does not have any potential particulate matter emissions greater than 100 tons per year or actual emissions greater than 10 tons per year (see Appendix A pages 1 - 3). Therefore, 326 IAC 6.5-1 does not apply. This source is not specifically identified in 6.5-6. Therefore, 326 IAC 6.5-6 does not apply. The source does not have any emission units used for indirect heating. Therefore, 326 IAC 6-2 does not apply. This source does not have any particulate emissions. Therefore, 326 IAC 6-3 does not apply.
- (h) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (i) 26 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (j) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from each new and modified unit is less than twenty-five (25) tons per year (see Appendix A pages 1 - 3).
- (k) 326 IAC 8-2-1 (Surface Coating Emission Limitations)  
Although this source involves the coating of paper, it is not subject to 326 IAC 8-2-5 (Paper Coating Operations) because no individual facility has the potential to emit greater than twenty-five (25) tons of VOC per year, or actual emissions greater than fifteen (15) pounds of VOC per day (lb/day). Therefore, 326 IAC 8-2-5 does not apply.
- (l) There are no other 326 IAC 8 Rules that are applicable to the printing presses.
- (m) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (n) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this Notice Only Change. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M097-20182-00548, issued on February 28, 2005.

### Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
  - (1) In order to incorporate the new presses, revise emission unit descriptions, and remove presses which have been taken out of service, the facility descriptions have been revised. Also, a statement of nonapplicability for 326 IAC 8-2-5 is being added for the presses in section D.1. Condition A.2 and section D.1 have been revised as follows:

#### A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) ~~Five (5) screen printing presses, identified as SP1-1A&B, SP1-2A&B, SP1-3A&B, SP1-4A&B, and SP1-5A&B, to be installed in 2005, using no control, and exhausting to stacks 1-1A&B, 1-2A&B, 1-3A&B, 1-4A&B, and 1-5A&B, respectively with a combined maximum throughput of 95 sfm (square feet per minute).~~

**One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 1, installed in 2005, using no control, and exhausting to stacks SP1-1A&B through SP1-5A&B respectively, with a combined maximum throughput of 15,750 sfh (square feet per hour).**

- (b) ~~Five (5) screen printing presses, identified as SP2-1A&B, SP2-2A&B, SP2-3A&B, SP2-4A&B, and SP2-5A&B, to be installed in 2005, using no control, and exhausting to stacks 2-1A&B, 2-2A&B, 2-3A&B, 2-4A&B, and 2-5A&B, respectively, with a combined maximum throughput of 104 sfm (square feet per minute).~~

**One (1) screen press, consisting of five (5) printing stations, identified as M&R**

**Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour).**

- ~~(c) One (1) screen printing press, identified as SP-PatII, to be installed in 2005, using no control, and exhausting to stack PatIIA&B, with a maximum throughput of 53 sfm (square feet per minute).~~
- ~~(d) One (1) screen printing presses, identified as SP-PatIAB, to be installed in 2005, using no control, and exhausting to stacks Pat1A, and Pat1B with a maximum throughput of 53 sfm (square feet per minute).~~
- ~~(e) One (1) screen printing presses, SP-Eclipse1AB, to be installed in 2005, using no control, and exhausting to stacks M&R-EclipseA, and M&R-EclipseB with a maximum throughput of 28 sfm (square feet per minute).~~
- ~~(f) One (1) screen printing press, identified as SP-M&R, to be installed in 2005, using no control, and exhausting to stack M&R-A, with a maximum throughput of 63 sfm (square feet per minute).~~
- ~~(g) (c) One (1) screen printing press, identified as SP-Conquest, to be installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 68 sfm (square feet per minute).~~

**One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).**

- ~~(h) (d) Six (6) screen printing presses, identified as SP3-1A&B, SP3-2A&B, SP3-3A&B, SP3-4A&B, SP3-5A&B, and SP3-6A&B, to be installed in 2005, using no control, and exhausting to stacks 3-1A&B, 3-2A&B, 3-3A&B, 3-4A&B, 3-5A&B, 3-6A&B, respectively, with a combined maximum throughput of 94 sfm (square feet per minute).~~

**One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).**

- ~~(i) (e) One (1) digital printing presses, installed in 2004, identified as Vutek, using no control, and exhausting to stack Digital with a maximum throughput of 3 sfm (square feet per minute).~~

**One digital printing press, identified as Vutek, installed in 2004, using no control, and exhausting to stack Digital, with a maximum throughput of 199.87 sfh (square feet per hour).**

- ~~(j) One (1) digital printing presses, installed in 2004, identified as Inca, using no control, and exhausting to stack Digital with a maximum throughput of 93 sfm (square feet per minute).~~
- (f) One (1) Inca Turbo digital printing press, identified as Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).**
- (g) One (1) Inca Turbo digital printing press, identified as Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).**

- (h) **One (1) Spyder digital printing press, identified as Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).**
- (i) **One (1) Colorspan digital printing press, identified as Macdermid, installed in 2007, using no control, with a maximum throughput of 399.6 sfh (square feet per hour).**

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) ~~Five (5) screen-printing presses, identified as SP1-1A&B, SP1-2A&B, SP1-3A&B, SP1-4A&B, and SP1-5A&B, to be installed in 2005, using no control, and exhausting to stacks 1-1A&B, 1-2A&B, 1-3A&B, 1-4A&B, and 1-5A&B, respectively with a combined maximum throughput of 95 sfm (square feet per minute).~~

**One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 1, installed in 2005, using no control, and exhausting to stacks SP1-1A&B through SP1-5A&B respectively, with a combined maximum throughput of 15,750 sfh (square feet per hour).**

- (b) ~~Five (5) screen-printing presses, identified as SP2-1A&B, SP2-2A&B, SP2-3A&B, SP2-4A&B, and SP2-5A&B, to be installed in 2005, using no control, and exhausting to stacks 2-1A&B, 2-2A&B, 2-3A&B, 2-4A&B, and 2-5A&B, respectively, with a combined maximum throughput of 104 sfm (square feet per minute).~~

**One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour)**

- ~~(c) One (1) screen-printing press, identified as SP-PatII, to be installed in 2005, using no control, and exhausting to stack PatIIA&B, with a maximum throughput of 53 sfm (square feet per minute).~~

- ~~(d) One (1) screen-printing presses, identified as SP-PatIAB, to be installed in 2005, using no control, and exhausting to stacks Pat1A, and Pat1B with a maximum throughput of 53 sfm (square feet per minute).~~

- ~~(e) One (1) screen-printing presses, SP-Eclipse1AB, to be installed in 2005, using no control, and exhausting to stacks M&R-EclipseA, and M&R-EclipseB with a maximum throughput of 28 sfm (square feet per minute).~~

- ~~(f) One (1) screen-printing press, identified as SP-M&R, to be installed in 2005, using no control, and exhausting to stack M&R-A, with a maximum throughput of 63 sfm (square feet per minute).~~

- ~~(g) (c) One (1) screen-printing press, identified as SP-Conquest, to be installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 68 sfm (square feet per minute).~~

**One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).**

- (h) (d) ~~Six (6) screen-printing presses, identified as SP3-1A&B, SP3-2A&B, SP3-3A&B, SP3-4A&B, SP3-~~

~~5A&B, and SP3-6A&B, to be installed in 2005, using no control, and exhausting to stacks 3-1A&B, 3-2A&B, 3-3A&B, 3-4A&B, 3-5A&B, 3-6A&B, respectively, with a combined maximum throughput of 94 sfm (square feet per minute).~~

**One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).**

- ~~(i) (e) One (1) digital printing presses, installed in 2004, identified as Vutek, using no control, and exhausting to stack Digital with a maximum throughput of 3 sfm (square feet per minute).~~

**One digital printing press, identified as Vutek, installed in 2004, using no control, and exhausting to stack Digital, with a maximum throughput of 199.87 sfh (square feet per hour).**

- ~~(j) One (1) digital printing presses, installed in 2004, identified as Inca, using no control, and exhausting to stack Digital with a maximum throughput of 93 sfm (square feet per minute).~~

- (f) One (1) Inca Turbo digital printing press, identified as Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).**

- (g) One (1) Inca Turbo digital printing press, identified as Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour)**

- (h) One (1) Spyder digital printing press, identified as Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).**

- (i) One (1) Colorspan digital printing press, identified as Macdermid, installed in 2007, using no control, with a maximum throughput of 399.6 sfh (square feet per hour)**

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

There are no applicable conditions for these facilities.

Any change or modification which would increase VOC emission potential to greater than 25 tons per year, a single HAP emission potential to greater than 10 tons per year, or a combination of HAPs emission potential to greater than 25 tons per year may require prior approval from IDEM, OAQ before such change can occur.

**Pursuant to 326 IAC 8-2-1(a)(4), the VOC actual emissions from the screen and digital press operations are each less than 15 pounds per day, thus rendering 326 IAC 8-2-5 not applicable.**

- (b) Upon further review, IDEM, OAQ and OES have decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, Marion County is no longer nonattainment for ozone under the 8-hour standard. Since Marion County is nonattainment for PM2.5, the county attainment status is being updated to reflect this. Also, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document. Condition A.1 has been

revised as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates screen and digital printing.

Authorized Individual: ~~David Pratt~~

Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226

Mailing Address: P.O. Box 18179, Indianapolis, Indiana 46218

General Source Phone: (317) 524-3217

SIC Code: 2759

County Location: Marion County

Source Location Status: ~~Nonattainment for ozone under the 8-hour standard~~

**Nonattainment for PM2.5**

Attainment for all other criteria pollutants.

Source Status: Minor Source Operating Permit

Minor Source, under PSD and ~~Emission Offset Rules~~ **Nonattainment**

**NSR**

Minor Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

- (2) All occurrences of IDEM's mailing addresses have been updated in the permit. Any occurrences of P.O. Box 6015 in the permit have been removed, any occurrences of the zip code 46206-6015 or 46204 have been revised to **46204-2251**, and all addresses have been revised to include a mail code (MC) as follows:

Asbestos Section: **MC 61-52 IGCN 1003**

Compliance Branch: **MC 61-53 IGCN 1003**

Permits Branch: **MC 61-53 IGCN 1003**

- (3) All occurrences of the Compliance Data Branch facsimile number have been revised to 317-233-~~5967~~ **6865**.

- (4) Permit condition B.11 has been revised to reflect the correct contact information for OES as follows:

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: ~~1-800-451-6027 or 317-233-4230 (ask for O&A, Billing, Licensing, and Training Section)~~ **317-327-2234 (ask for OES, Air Compliance)**, to determine the appropriate permit fee.

<b>Conclusion and Recommendation</b>
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Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 19, 2006. Additional information was submitted on March 25, 2008.

The construction and operation of this proposed Notice Only Change shall be subject to the conditions of the attached proposed MSOP Notice Only Change No. 097-25795-00548. The staff recommends to the Administrator that this MSOP Notice Only Change be approved.

<b>OES Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Anh-tuan Nguyen at Indianapolis Office of Environmental Services, Permits Section, 2700 South Belmont, Indianapolis, Indiana 46221 or by telephone at (317) 327-2353.
- (b) A copy of the findings is available on the Internet at: <http://www.idem.in.gov>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**Appendix A: Emissions Calculations**  
**VOC and HAP Emissions From Digital Printing Press Operations**

**Company Name:** Pratt Corporation  
**Address City IN Zip:** 3035 North Shadeland Avenue, Indianapolis, Indiana 46226  
**Permit Number:** 097-25795-00548  
**Plt ID:** 097-00548  
**Reviewer:** A. Nguyen  
**Date:** 1/16/2008

**Digital Presses**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
Vutek	0.506	79	252
Inca Spyder	1.798	63	714
Inca Turbo I	1.438	63	571
Inca Turbo II	1.438	63	571
Macdermid	1.11	72	504

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/Mmin <sup>2</sup> )	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (TONS/YEAR)	Glycol Ether Emissions (TONS/YEAR)
Vutek / Vutek Ink	42.92	93%	80%	100.00%	252	5.00	4.33
Inca Spyder / Sericol ink	14.4	2%	2%	100.00%	714	0.10	0.10
Inca Turbo 1 / Inca Ink	14.41	2%	2%	100.00%	571	0.08	0.08
Inca Turbo 2 / Inca Ink	14.36	2%	2%	100.00%	571	0.08	0.08
Macdermid / Macdermid ink	45.6	30%	30%	100.00%	504	3.45	3.45

Total VOC Emissions =	<b>8.72</b>	<b>Ton/yr</b>
Total HAP Emissions =	<b>8.04</b>	<b>Ton/yr</b>

**METHODOLOGY**

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds  
 Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year  
 VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year  
 NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.  
 (Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

**Appendix A: Emissions Calculations  
VOC and HAP Emissions From Printing Screen Press Operations**

**Company Name:** Pratt Corporation  
**Address City IN Zip:** 3035 North Shadeland Avenue, Indianapolis, Indiana 46226  
**Permit Number:** 097-25795-00548  
**Pit ID:** 097-00548  
**Reviewer:** A. Nguyen  
**Date:** 1/16/2008

**Screen Presses**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
M&R Processor 1	26.25	120	19868
M&R Processor 2	29.17	120	22078
Thieme	63.19	105	41848
Conquest	21.11	50	6657

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/Mmin <sup>2</sup> )	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (TONS/YEAR)	Glycol Ether Emissions (TONS/YEAR)
M&R Processor 1	20	1%	0%	100.00%	19868	1.99	0.00
M&R Processor 2	20	1%	0%	100.00%	22078	2.21	0.00
Thieme	20	1%	0%	100.00%	41848	4.18	0.00
Conquest	20	1%	0%	100.00%	6657	0.67	0.00

	Total VOC Emissions =	<b>9.05</b>	<b>Ton/yr</b>
	Total HAP Emissions =	<b>0.00</b>	<b>Ton/yr</b>

**METHODOLOGY**

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds  
 Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year  
 VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* 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%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

**Appendix A: Emissions Calculations**  
**VOC and HAP Emissions From Manual Operations (Cleaning & Screen Preparation)**

**Company Name:** Pratt Corporation  
**Address City IN Zip:** 3035 North Shadeland Avenue, Indianapolis, Indiana 46226  
**Permit Number:** 097-25795-00548  
**Plt ID:** 097-00548  
**Reviewer:** A. Nguyen  
**Date:** 1/16/2008

	Usage per screen (Gallons)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	Glycol Ether wt. %	Glycol Ether PTE (tons/yr)	Dicloro-mehtane wt. %	Dicloro-mehtane PTE (tons/yr)	Tetracloro-ethylene wt. %	Tetracloro-ethylene PTE (tons/yr)	Total HAP PTE (tons/yr)
<b>Screen Chemicals (Solvents)</b>											
ICC 8198 Spray/Wipe	0.069	6.7	43%	2.09	15%	0.73					0.73
857 Spray and Wipe	0.035	8.33	26%	0.80	30%	0.92					0.92
XID-505 Ink Degradent	0.041	8.45	91%	3.31							0.00
Spiff Cleaner	0.004	10.58	100%	0.44			75%	0.33	15%	0.07	0.40

6.63 Total VOC

2.05 Total HAPs

**Methodology**

VOC (Tons/Year) = Usage per screen (gallons) \* 20986 maximum screens per year \* density (lbs/gallon) \* weight % volatiles \* 1 Ton/2000 pounds

HAPs (Tons/Year) = Usage per screen (gallons) \* 20986 maximum screens per year \* density (lbs/gallon) \* weight % HAP \* 1 Ton/2000 pounds

Usage information supplied by the source

<b>Digital Cleaning (Flushing Solution)</b>	Usage (lbs/day)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	Glycol Ether wt. %	Glycol Ether PTE (tons/yr)	Dicloro-mehtane wt. %	Dicloro-mehtane PTE (tons/yr)	Tetracloro-ethylene wt. %	Tetracloro-ethylene PTE (tons/yr)	Total HAP PTE (tons/yr)
QU-016 (Vutek)	0.7303	7.84	100%	0.1333	100%	0.1333					0.1333
QV-017 (Inca's)	1.4098	8.04	100%	0.2573	100%	0.2573					0.2573
SolaChrome UV (MacDermid)	0.0123	9.00	100%	0.0022	100%	0.0022					0.0023
<b>Screen and Digital</b>											
Nazdar SW208 Isoproply Alcohol	2.1534	6.55	99%	0.39							

0.78 Total VOC

0.39 Total HAPs

**Methodology**

VOC & HAP (Tons/Year) = Usage (lbs/day) \* 365 days/year \* weight % volatiles \* 1 Ton/2000 pounds

Usage information supplied by the source

	VOC (tons/yr)	HAPs (tons/yr)
Total from Manual Operations	<b>7.42</b>	<b>2.44</b>