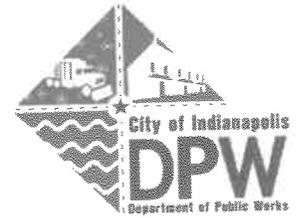


Certified Mail Number 7007 0710 0005 3957 5378



DATE: January 5, 2009

TO: Interested Parties / Applicant

RE: Pratt Corporation / F097-26563-00548

FROM: Richard Wise *RW*
Administrator
Office of Environmental Services

Notice of Decision: Approval - Effective Immediately

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

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

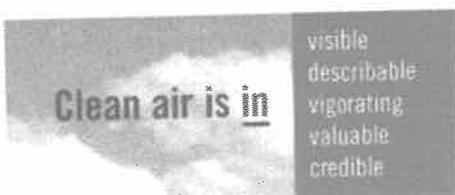
- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt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

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

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

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

Enclosures



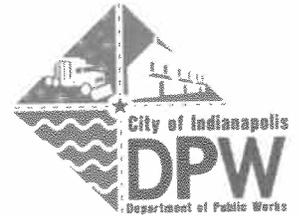
Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274

YDD 327-5186
indygov.org/dpw



**New Source Construction
and Federally Enforceable State Operating Permit
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
AND OFFICE OF ENVIRONMENTAL SERVICES**

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

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

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

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

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

Operation Permit No.: F097-26563-00548	
Issued by: <i>Richard Wise</i> Richard Wise Administrator Indianapolis Office of Environmental Services	Issuance Date: January 5, 2009 Expiration Date: January 5, 2014



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

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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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 through 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 2-8-3(b)]

The Permittee owns and operates a stationary screen and digital printing operation.

Source Address:	3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address:	3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
General Source Phone Number:	(317) 524-3216
SIC Code:	2759
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

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

- (f) One (1) Inca Spyder digital printing press, identified as Inca Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (g) 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).
- (h) One (1) digital printing press, identified as HPXL1500, constructed in 2008, using no control, with a maximum throughput of 1,269.48 (square feet per hour).
- (i) One (1) digital printing press, identified as Mimaki, constructed in 2008, using no control, with a maximum throughput of 188.29 (square feet per hour).
- (j) One (1) digital printing press, identified as FB6700-1, constructed in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).
- (k) One (1) digital printing press, identified as FB6700-2, approved for construction in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).
- (l) Manual operations, consisting of cleaning and screen preparations for the digital and screen presses.

A.3 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and [326 IAC 2-8] when prior to the start of operation, the following requirements are met:

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

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F097-26563-00548, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

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

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

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

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

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

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-26563-00548 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

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

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.19 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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 nine (9) months 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 2-8 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.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

B.22 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) The potential to emit particulate matter less 2.5 microns (PM_{2.5}) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification 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).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, 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 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) 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).
- (b) 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).
- (c) 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).
- (d) One (1) Inca Turbo digital printing press, identified as IncaTurbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (e) One (1) Inca Turbo digital printing press, identified as Inca Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (f) One (1) Inca Spyder digital printing press, identified as Inca Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (g) 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).
- (h) One (1) digital printing press, identified as HPXL1500, constructed in 2008, using no control, with a maximum throughput of 1,269.48 (square feet per hour).
- (i) One (1) digital printing press, identified as Mimaki, constructed in 2008, using no control, with a maximum throughput of 188.29 (square feet per hour).
- (j) One (1) digital printing press, identified as FB6700-1, constructed in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).
- (k) One (1) digital printing press, identified as FB6700-2, approved for construction in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).
- (l) Manual operations, consisting of cleaning and screen preparations for the digital and screen 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 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 2-8-4:

- (a) The individual HAP usage for the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki shall be limited to less than 6.96

tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total combined HAP usage for the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki shall be limited to less than 15.71 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the VOC usage from the digital press, identified as HPXL1500, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit the VOC emissions from HPXL1500 to less than 25 tons per twelve (12) consecutive month period. Therefore, 326 IAC 8-1-6 does not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below for the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.1.

(1) The amount and HAP content of each coating material.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The total HAP usage for each month; and

(4) The weight of HAP's emitted for each compliance period.

- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below for the digital press, identified as HPXL1500. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount of coating material used less water on daily basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The total VOC usage for each day (or month); and
- (3) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Pratt Corporation
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
FESOP Permit No.: F097-26563-00548

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Pratt Corporation
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
FESOP Permit No.: F097-26563-00548

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Pratt Corporation
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
FESOP Permit No.: F097-26563-00548
Facility: Digital presses, HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki
Parameter: Single HAP (glycol ether)
Limit: The individual HAP usage for the digital presses shall be limited to less than 6.96 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Single HAP)	Previous 11 Months (Single HAP)	12 Month Total (Single HAP)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Pratt Corporation
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
FESOP Permit No.: F097-26563-00548
Facility: Digital presses, HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki
Parameter: Combined HAPs
Limit: The total combined HAP usage for the digital presses shall be limited to less than 15.71 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Combined HAPs)	Previous 11 Months (Combined HAPs)	12 Month Total (Combined HAPs)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Pratt Corporation
Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
FESOP Permit No.: F097-26563-00548
Facility: Digital press HPXL1500
Parameter: VOC
Limit: The VOC usage from the digital press, identified as HPXL1500, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period each with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Pratt Corporation
 Source Address: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
 Mailing Address: 3035 North Shadeland Avenue, Suite 100, Indianapolis, Indiana 46226
 FESOP Permit No.: F097-26563-00548

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to:

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

Pratt Corporation
3035 North Shadeland Avenue
Indianapolis, Indiana 46226

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Pratt Corporation 3035 North Shadeland Avenue, Indianapolis, Indiana 46226, completed construction of the screen and digital printing operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality and the Office of Environmental Services on May 19, 2008 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F097-26563-00548, Plant ID No. 097-00548 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____

Name _____ (typed or printed)

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

Addendum to the Technical Support Document (TSD) for a Minor
Source Operating Permit (MSOP) Transitioning to a Federally
Enforceable State Operating Permit (FESOP) with New Source
Construction

Source Name:	Pratt Corporation
Source Location:	3035 North Shadeland Avenue, Indianapolis, Indiana 46226
County:	Marion
SIC Code:	2759
Operation Permit No.:	F097-26563-00548
Permit Reviewer:	A. Nguyen

On November 22, 2008, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Pratt Corporation had applied for a new source construction Federally Enforceable State Operating Permit (FESOP) transitioning from a Minor Source Operating Permit (MSOP) for a screen and digital printing operation. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments on the draft FESOP. Upon further review, the OAQ and OES have decided to make the following revisions to the FESOP. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with ~~strikeout~~ has been deleted.

The comments and responses, including changes to the permit, are as follows:

Change 1:

Upon further review, the OAQ and OES have decided to make the following revisions to the FESOP. IDEM has decided not to renew air permitting contractual obligations for the City of Indianapolis. Therefore, all references to the City of Indianapolis Office of Environmental Services for reporting requirements and as the issuing authority have been removed from the FESOP F097-26563-00548.

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

**Technical Support Document (TSD) for a Minor Source Operating Permit
(MSOP) Transitioning to a Federally Enforceable State Operating Permit
(FESOP) with New Source Construction**

Source Description and Location
--

Source Name:	Pratt Corporation
Source Location:	3035 North Shadeland Avenue, Indianapolis, Indiana 46226
County:	Marion
SIC Code:	2759
Operation Permit No.:	F097-26563-00548
Permit Reviewer:	A. Nguyen

On May 19, 2008, the Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services received an application from Pratt Corporation related to the construction and operation of new emission units at an existing screen and digital printing operation and transition from a MSOP to a FESOP.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP No. 097-20182-00548, issued on February 28, 2005.
- (b) MSOP First Notice Only Change No. 097-25795-00548, issued on April 9, 2008.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th 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 ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	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

Pollutant	Designation
	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.
¹ 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.	

(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. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for CO, Pb, SO₂, PM10, NO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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 and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services have reviewed an application, submitted by Pratt Corporation on May 19, 2008, relating to the construction of two (2) digital presses and the removal of one (1) digital press. The addition of the two (2) new presses will make the source wide potential of single HAPs greater than 10 tons per year and combined HAPs greater than 25 tons per year. The source has agreed to limit single HAP emissions to less than 10 tons per year and combined HAP emissions to less than 25 tons per year. As a result of this application, the source is transitioning from a MSOP to a FESOP.

On August 18, 2008, Pratt Corporation submitted a second application related to the construction of another digital press and the removal of one of the screen presses. This application was assigned tracking number 26893 and combined into this permit.

The source consists of the following permitted emission units:

- (a) 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).
- (b) 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).
- (c) 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).
- (d) One (1) Inca Turbo digital printing press, identified as Inca Turbo 1, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (e) One (1) Inca Turbo digital printing press, identified as Inca Turbo 2, installed in 2006, using no control, with a maximum throughput of 452.97 sfh (square feet per hour).
- (f) One (1) Spyder digital printing press, identified as Inca Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (g) 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).
- (h) Manual operations, consisting of cleaning and screen preparations for the digital and screen presses.

The following emission units have been removed from the source:

- (a) One (1) 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).
- (b) 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).

The following new emission unit is approved for construction:

- (a) One (1) digital printing press, identified as FB6700-2, approved for constructed in 2008, using no controls, with a maximum throughput of 1613.75 (square feet per hour).

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) digital printing press, identified as HPXL1500, constructed in 2008, using no control, with a maximum throughput of 1,269.48 (square feet per hour).

- (b) One (1) digital printing press, identified as Mimaki, constructed in 2008, using no control, with a maximum throughput of 188.29 (square feet per hour).
- (c) One (1) digital printing press, identified as FB6700-1, constructed in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).

Enforcement Issues

IDEM and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM and OES are 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 – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM10 ⁽¹⁾	0.0
PM2.5	0.0
SO ₂	0.0
NO _x	0.0
VOC	79.07
CO	0.0

(1) 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".

HAPs	Potential To Emit (tons/year)
ester	7.90
glycol ether	31.90
TOTAL HAPs	40.20

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of all regulated criteria pollutants are less than one hundred (100) tons per year.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Highest Single HAP
One (1) screen printing press / M&R Processor 2	0.0	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	0.0	0.67	0.0	0.0	0.0
One (1) screen printing press / Thieme	0.0	0.0	0.0	0.0	0.0	4.18	0.0	0.0	0.0
Manual Operations (Cleaning & Screen Preparation)	0.0	0.0	0.0	0.0	0.0	8.33	0.0	8.29	7.90 ester
One (1) digital printing press / Inca Turbo 1	0.0	0.0	0.0	0.0	0.0	0.08	0.0	< 15.71	< 6.96
One (1) digital printing press / Inca Turbo 2	0.0	0.0	0.0	0.0	0.0	0.08	0.0		
One (1) digital printing press / Inca Spyder	0.0	0.0	0.0	0.0	0.0	0.10	0.0		
One (1) digital printing press / Macdermid	0.0	0.0	0.0	0.0	0.0	3.45	0.0		
One (1) digital printing press / HPXL1500	0.0	0.0	0.0	0.0	0.0	<25 ¹	0.0		
One (1) digital printing press / Mimaki	0.0	0.0	0.0	0.0	0.0	4.06	0.0		
One (1) digital printing press / FB6700-1	0.0	0.0	0.0	0.0	0.0	12.44	0.0	0.0	0.0
One (1) digital printing press / FB6700-2	0.0	0.0	0.0	0.0	0.0	12.44	0.0	0.0	0.0
Total PTE of Entire Source	0.0	0.0	0.0	0.0	0.0	73.05	0.0	< 25	< 10
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD & Nonattainment NSR Major Source Thresholds	250	250	100	250	250	250	250	NA	NA
* 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".									

1 - VOC is limited to less than 25 tons/year to render 326 IAC 8-1-6 not applicable.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single

HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The individual HAP usage for the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki shall be limited to less than 6.96 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The total combined HAP usage for the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki shall be limited to less than 15.71 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (b) **PSD Minor Source**
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all attainment regulated pollutants are less 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.
- (c) **Nonattainment New Source Review**
This existing source is not a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) since the potential PM_{2.5} emissions are less than 100 tons per year. Therefore, the Nonattainment New Source Review requirements are not applicable.

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 FESOP permit, 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 FESOP permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) 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 FESOP 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.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating, 40 CFR 63.3280, Subpart JJJJ (326 IAC 20-65-1), are not included in the FESOP permit, since Pratt Corporation does not operate a web coating line and is

not a major source of HAPs.

- (e) 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 FESOP permit.

Compliance Assurance Monitoring (CAM)

- (f) 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 source:

- (a) 326 IAC 1-5-2 (Emergency Reduction Plans)
An Emergency Reduction Plan (ERP) is not required for Pratt Corporation because all regulated pollutants are less than hundred (100) tons per year.
- (b) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki, are greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the digital presses, identified as HPXL1500, Inca Spyder, Inca Turbo 1, Inca Turbo 2, Macdermid, and Mimaki, to 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. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (f) 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.
- (g) 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.

- (h) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
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 - 4). Therefore, 326 IAC 6.5-1 does not apply. This source is not specifically identified in 326 IAC 6.5-6. Therefore, 326 IAC 6.5-6 does not apply. This source does not have any particulate emissions. Therefore, 326 IAC 6-3 does not apply.
- (i) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The source does not have any emission units used for indirect heating. Therefore, 326 IAC 6-2 does not apply.
- (j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
This source does not have any particulate emissions. Therefore, 326 IAC 6-3 does not apply.
- (k) 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.
- (l) 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.
- (m) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to new facilities constructed after January 1, 1980 with the potential to emit of VOC of 25 tons per year or more. Only the digital press, identified as HPXL1500, has potential VOC emissions greater than 25 tons (See Appendix A, page 1).

The following limit shall apply the digital press, identified as HPXL1500, in order to render 326 IAC 8-1-6 not applicable:
 - (a) The VOC usage from the digital press, identified as HPXL1500, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (n) 326 IAC 8-2-5 (Paper Coating Operations)
Although this source involves the coating of paper, Pratt Corporation does not conduct web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels. Therefore, 326 IAC 8-2-5 does not apply.
- (o) 326 IAC 8-5-5 (Graphic Arts Operations)
This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing facilities existing as of November 1, 1980, which have potential VOC emissions of greater than one hundred (100) tons per year, or new facilities after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more VOC. Pratt Corporation does not operate a packaging rotogravure, a publication rotogravure, and/or a flexographic printing press. Therefore, 326 IAC 8-5-5 does not apply.
- (p) There are no other 326 IAC 8 Rules that are applicable to the printing presses.

- (q) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (r) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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- (a) There are no compliance determination and no compliance monitoring requirements applicable to this source.
- (b) There are no testing requirements applicable to this source.

Conclusion and Recommendation

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 May 19, 2008 with additional information on July 10, 2008.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 097-26563-00548. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

OES Contact

- (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.in.gov/ai/appfiles/idem-caats/>.
- (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.

**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: F097-26563-00548
Plt ID: 097-00548
Reviewer: A. Nguyen
Date: 7/17/2008

Digital Presses

THROUGHPUT				
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Square feet/hour (ft ² /hr)	MMin ² /YEAR
Inca Spyder	1.708	63	538.02	679
Inca Turbo I	1.438	63	452.97	571
Inca Turbo II	1.438	63	452.97	571
Macdermid	1.11	72	399.6	504
Mimaki	0.5949	63.3	188.29	238
HPXL1500	1.8891	134.4	1269.48	1601
FB6700-1	5.123	63	1613.75	2036
FB6700-2	5.123	63	1613.75	2036

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin ² /Year)	VOC Emissions (TONS/YEAR)	Single HAP (Glycol Ether) Emissions (TONS/YEAR)
Inca Spyder / Sericol ink	14.4	2%	2%	100.00%	679	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
Mimaki / Mimaki ink	43.05	80%	80%	100.00%	236	4.06	4.06
HPXL1500 / XL1500 ink	43.05	90%	70%	100.00%	1601	31.02	24.13
FB6700 / Scitex WB300 ink	30.56	40%	0%	100.00%	2036	12.44	0.00
FB6700 / Scitex WB300 ink	30.56	40%	0%	100.00%	2036	12.44	0.00

Total VOC Emissions =	63.68	Ton/yr
Total single HAP Emissions =	31.90	Ton/yr
Combined HAP Emission =	31.90	Ton/yr

METHODOLOGY

ft²/hr = square feet per hour

MMin² = million square inches

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

Throughput = Maxium line speed feet per minute * Maximum print width inches / 12 (convert inches to feet) * 60 minutes per hour = ft² per hour

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

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

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 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: F097-26563-00548
Pit ID: 097-00548
Reviewer: A. Nguyen
Date: 7/17/2008

Screen Presses

THROUGHPUT				
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Square feet/hour (ft ² /hr)	MMin ² /YEAR
M&R Processor 2	26.25	120	17500	19868
Thieme	63.19	105	33177	41848
Conquest	21.11	50	5276	6657

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin ² /Year)	VOC Emissions (TONS/YEAR)	Glycol Ether Emissions (TONS/YEAR)
M&R Processor 2	20	1%	0%	100.00%	19868	1.99	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 =	6.84 Ton/yr
Total HAP Emissions =	0.00 Ton/yr

METHODOLOGY

ft²/hr = square feet per hour

MMin² = million square inches

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

Throughput = Maximum line speed feet per minute * Maximum print width inches / 12 (convert inches to feet) * 60 minutes per hour = ft² per hour

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%. 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: F097-26563-00548
Pit ID: 097-00548
Reviewer: A. Nguyen
Date: 7/17/2008

Maximum screens per year = 20,986

	Usage per screen (Gallons)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	1,2 Epoxy butane wt. %	1,2 Epoxy butane PTE (tons/yr)	Sulfuric Acid wt. %	Sulfuric Acid PTE (tons/yr)	Esters wt. %	Esters PTE (tons/yr)	Total HAP PTE (tons/yr)
Screen Chemicals (Solvents)											
SPIFF CLEANER (ALB1090)	24	9.46	100%	0.11	1%	1.14E-03		0.00		0.00	0.00
STENCIL REMOVER X-TEND 1:55 (XSR-155)	128	10.41	0%	0.00		0.00	6.00%	0.04		0.00	0.04
INK DEGRADENT 520 (XID-520)*	1925	8.4	74%	5.94		0.00		0.00	95.00%	7.68	7.68
RHINO GLUE RHINOMITE 3500 SERIES (RT-RHINOMITE 3500G)	56	7.6	83%	0.18		0.00		0.00		0.00	0.00
CITRA CLEAN (36040)	144	7.04	90%	0.46		0.00		0.00		0.00	0.00
FINISH S2 GAL (SCBS00100PG001)	119	8.13	0%	0.00		0.00		0.00		0.00	0.00
GRAFIC HU42 5 GAL+DIAZO 1 (SCEC50601K5D01)	431	8.13	0%	0.00		0.00		0.00		0.00	0.00
					1-methoxy 2-propanol wt. %	1-methoxy 2-propanol PTE (tons/yr)					
SAATICHEM PW5 PRESS WASH	220	8.12	76%	0.68	10%	0.09		0.00	25.00%	0.22	0.31
GRAFIC HU GAL+DIAZO 1 (SCEC00201KGD01)	46		0%	0.00		0.00		0.00		0.00	0.00
DEFOAMER 405(154S30675/1)	4	8.34	19%	0.00		0.00		0.00		0.00	0.00
XTEND FAST2 HAZE REMOVER (XHR-FAST2/1)	94	9.65	60%	0.27		0.00		0.00		0.00	0.00
				Total VOC		7.64				Total HAP	8.03

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

Digital Cleaning (Flushing Solution)	Usage (lbs/day)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	Glycol Ether wt. %	Glycol Ether PTE (tons/yr)	Total HAP PTE (tons/yr)
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
	Max Usage (gal/yr)						
Mimaki*	2.0	7.91	50%	0.0040			
HPXL1500*	10.0	7.84	100%	0.0392			
Screen and Digital							
Nazdar SW208 Isopropyl Alcohol	2.1534	6.55	99%	0.39			
				0.69 Total VOC			0.26 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	8.33	8.29

Limited and Unlimited Potential to Emit Summary

Company Name: Pratt Corporation
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: F097-26563-00548
Plt ID: 097-00548
Reviewer: A. Nguyen
Date: 7/17/2008

Potential to Emit

Emission Unit	PM	PM-10	PM2.5	SO2	VOC	CO	NOx	Single HAPs*	Combined HAPs
HPXL1500	0	0	0	0	31.02	0	0	24.13	24.13
Inca Spyder	0	0	0	0	0.10	0	0	0.10	0.10
Inca Turbo 1	0	0	0	0	0.08	0	0	0.08	0.08
Inca Turbo 2	0	0	0	0	0.08	0	0	0.08	0.08
Macdermid	0	0	0	0	3.45	0	0	3.45	3.45
Mimaki	0	0	0	0	4.06	0	0	4.06	4.06
FB6700-1	0	0	0	0	12.44	0	0	0	0
FB6700-2	0	0	0	0	12.44	0	0	0	0
M&R Processor 2	0	0	0	0	2.21	0	0	0	0
Thieme	0	0	0	0	4.18	0	0	0	0
SP-Conquest	0	0	0	0	0.67	0	0	0	0
Manual Operations	0	0	0	0	8.33	0	0	7.90	8.29
Total	0.00	0.00	0.00	0.00	79.07	0.00	0.00	24.13	40.20

*Single HAP listed is glycol ether for all emission units except for the Manual Operations which an ester.

FESOP limit

Emission Unit	PM	PM-10	PM2.5	SO2	VOC	CO	NOx	Single HAPs	Combined HAPs
HPXL1500	0	0	0	0	< 25*	0	0	6.96	15.71
Inca Spyder	0	0	0	0	0.10	0	0		
Inca Turbo 1	0	0	0	0	0.08	0	0		
Inca Turbo 2	0	0	0	0	0.08	0	0		
Macdermid	0	0	0	0	3.45	0	0		
Mimaki	0	0	0	0	4.06	0	0	0	0
FB6700-1	0	0	0	0	12.44	0	0	0	0
FB6700-2	0	0	0	0	12.44	0	0	0	0
M&R Processor 2	0	0	0	0	2.21	0	0	0	0
Thieme	0	0	0	0	4.18	0	0	0	0
SP-Conquest	0	0	0	0	0.67	0	0	0	0
Manual Operations	0	0	0	0	8.33	0	0	7.90	8.29
Total	0.00	0.00	0.00	0.00	73.05	0.00	0.00	< 10	< 25

*VOC is limited to less than 25 tons/year to render 326 IAC 8-1-6 not applicable.