INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: April 3, 2009

RE: Litho Press, Inc. / 097-27511-00657

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08

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REGISTRATION
OFFICE OF AIR QUALITY

Litho Press, Inc.
1747 Massachusetts Avenue
Indianapolis, IN 46201

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 097-27511-00657	
Issued by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 3,2009

SECTION A SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary lithographic printing operation.

Source Address:	1747 Massachusetts Ave, Indianapolis, IN 46201
Mailing Address:	1747 Massachusetts Ave, Indianapolis, IN 46201
General Source Phone Number:	(317) 634-6468
SIC Code:	2752
County Location:	Marion County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) sheet-fed offset lithographic printing press, identified as MR-1, constructed in 2002, exhausting to stacks S1 and S2, with a maximum capacity of 12,000 sheets per hour.

(b) One (1) sheet-fed offset lithographic printing press, identified as MR-2, constructed in 2004, exhausting to stacks S3, S4 and S5, with a maximum capacity of 11,000 sheets per hour.

(c) One (1) sheet-fed offset lithographic printing press, identified as MR-3, constructed in 2008, exhausting to stack S6, with a maximum capacity of 11,000 sheets per hour.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration 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.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this registration.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.

(d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to Registration No. 097-27511-00657 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

Indianapolis, IN 46204-2251

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

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

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

The Registrant 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).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

REGISTRATION
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Litho Press, Inc.
Address:	1747 Massachusetts Avenue
City:	Indianapolis, IN 46201
Phone Number:	(317) 634-6468
Registration No.:	097-27511-00657

I hereby certify that Litho Press, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Litho Press, Inc. is :
- ☐ in compliance with the requirements of Registration No. 097-27511-00657.
- ☐ not in compliance with the requirements of Registration No. 097-27511-00657.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	**Litho Press, Inc.**
Source Location:	**1747 Massachusetts Avenue, Indianapolis, IN 46201**
County:	**Marion**
SIC Code:	**2752**
Registration No.:	**097-27511-00657**
Permit Reviewer:	**Summer Keown**

On February 20, 2009, the Office of Air Quality (OAQ) received an application for a Registration from Litho Press, Inc. related to the operation of an existing lithographic printing operation. Though the applicant can qualify for an Exemption, they have requested to be issued a Registration.

Existing Approvals

There have been no previous approvals issued to this source.

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 11th 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 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.
Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

(a) Ozone Standards

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 all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Litho Press, Inc. on February 20, 2009, relating to the operation of a lithographic printing press operation.

The source consists of the following existing emission units:

(a) One (1) sheet-fed offset lithographic printing press, identified as MR-1, constructed in 2002, exhausting to stacks S1 and S2, with a maximum capacity of 12,000 sheets per hour.

(b) One (1) sheet-fed offset lithographic printing press, identified as MR-2, constructed in 2004, exhausting to stacks S3, S4 and S5, with a maximum capacity of 11,000 sheets per hour.

(c) One (1) sheet-fed offset lithographic printing press, identified as MR-3, constructed in 2008, exhausting to stack S6, with a maximum capacity of 11,000 sheets per hour.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A, pages 1 through 4, of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Printing Press MR-1	0.32	0.32	0.32	0.00	0.00	1.39	0.00	0.08	0.05 (diethanolamine)
Printing Press MR-2	0.56	0.56	0.56	0.00	0.00	2.42	0.00	0.14	0.08 (diethanolamine)

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Printing Press MR-3	0.94	0.94	0.94	0.00	0.00	4.04	0.00	0.23	0.13 (diethanolamine)
Inkjet Printers	negl.	negl.	negl.	0.00	0.00	0.01	0.00	0.01	0.01 (ethylene glycol)
Total PTE of Entire Source	**1.82**	**1.82**	**1.82**	**0.00**	**0.00**	**7.86**	**0.00**	**0.26**	**0.26 (diethanolamine)**
Exemption Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible
* 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".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC is within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Although the potential to emit of all regulated criteria pollutants is less than Exemption levels, the applicant has requested to be issued a Registration. Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

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 in the permit, since the lithographic printing presses are not rotogravure printing units.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the 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, Subpart KK) (326 IAC 20-18), are not included in the permit, since the lithographic printing presses are not located at a major source of hazardous air pollutants (HAPs).

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating (40 CFR 63, Subpart JJJJ) (326 IAC 20-65) are not included in the permit, since the lithographic printing presses are not located at a major source of hazardous air pollutants (HAPs).

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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

(a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(c) 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.

(d) 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.

(e) 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.

(f) 326 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.

(h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Lithographic Printing Presses

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The three (3) lithographic printing presses, identified as MR-1, MR-2, and MR-3, are not subject to the requirements of 326 IAC 6-3-2 because each unit has the potential to emit less than 0.551 pounds per hour of PM.

(i) 326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)
The three (3) lithographic printing presses, identified as MR-1, MR-2, and MR-3, are not subject to the requirements of 326 IAC 6.5-1-1 because their potential to emit PM is less than one hundred (100) tons per year and their actual emissions are less than ten (10) tons per year.

(i) 326 IAC 8-2-5 (Paper Coating Operations)
The three (3) lithographic printing presses, identified as MR-1, MR-2, and MR-3, are not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because the press is lithographic and this rule applies only to web coating and saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels. These units are sheet-fed.

(k) 326 IAC 8-5-5 (Graphic Arts Operations)
This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing sources. The three (3) lithographic printing presses, identified as MR-1, MR-2, and MR-3, are not subject to this rule, because they are not publication, product and packaging rotogravure printing presses, nor are they flexographic printing presses. These units are lithographic printing presses.

(l) 326 IAC 8-6-1 (Organic Solvent Emission Limitation)
The three (3) lithographic printing presses, identified as MR-1, MR-2, and MR-3, are not subject to the requirements of 326 IAC 8-6-1 because the potential to emit VOC from the entire source is less than one hundred (100) tons per year.

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 February 20, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 097-27511-00657. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.

(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

Potential Emissions Summary

Company Name: **Litho Press, Inc.**

Address City IN Zip: **1747 Massachusetts Avenue, Indianapolis IN 4620**

Registration Number: **097-27511-00657**

Reviewer: **Summer Keown**

Date: **March 24, 2009**

Uncontrolled Potential to Emit

Emissions Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Highest Single HAP	Total HAPs
Printing Presses	0.30	0.30	0.30	0.00	0.00	7.85	0.00	0.26 (diethanolamine)	0.45
Inkjet Printers	negl.	negl.	negl.	0.00	0.00	0.01	0.00	negl.	negl.
Total	**0.30**	**0.30**	**0.30**	**0.00**	**0.00**	**7.86**	**0.00**	**0.26 (diethanolamine)**	**0.45**

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201
Registration Number: 097-27511-00657
Reviewer: Summer Keown
Date: March 24, 2009

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
MR-1 - Inks, Coatings, Fountain Solutions	470.83	40.90	60,729
MR-1 - Solvents, Parts Washer	470.83	40.90	24,292
MR-2 - Inks, Coatings, Fountain Solutions	599.65	55.90	105,711
MR-2 Solvents, Parts Washer	599.65	55.90	42,284
MR-3 - Inks, Coatings, Fountain Solutions	775.35	72.25	176,661
MR-3 - Solvents, Parts Washer	775.35	72.25	70,664

Source VOCS					
Source ID Material	Maxium Coverage* '(lbs/MMin^2)	Weight % Volatiles**	Flash Off %***	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
Press MR-1					
LLS-TTK Ink	0.163	27.63%	5.00%	60729	0.07
PS Aqueous Coating	0.061	4.50%	100.00%	60729	0.08
Nikken Mark IV Fountain Solution	0.032	30.58%	100.00%	60729	0.30
Cleaning Solvents	0.054	99.73%	100.00%	24292	0.65
Miscellaneous Parts Washer	0.024	100.00%	100.00%	24292	0.29
Total for Press MR-1					**1.39**
Press MR-2					
LLS-TTK Ink	0.163	27.63%	5.00%	105711	0.12
PS Aqueous Coating	0.061	4.50%	100.00%	105711	0.14
Nikken Mark IV Fountain Solution	0.032	30.58%	100.00%	105711	0.52
Cleaning Solvents	0.054	99.73%	100.00%	42284	1.13
Miscellaneous Parts Washer	0.024	100.00%	100.00%	42284	0.50
Total for Press MR-2					**2.42**
MR-3					
LLS-TTK Ink	0.163	27.63%	5.00%	176661	0.20
PS Aqueous Coating	0.061	4.50%	100.00%	176661	0.24
Nikken Mark IV Fountain Solution	0.032	30.58%	100.00%	176661	0.87
Cleaning Solvents	0.054	99.73%	100.00%	70664	1.89
Miscellaneous Parts Washer	0.024	100.00%	100.00%	70664	0.84
Total for Press MR-3					**4.04**

Source ID Material	Maxium Coverage* '(lbs/MMin^2)	Weight % Volatiles**	Flash Off %***	Throughput (lbs/Year)	Emissions (TONS/YEAR)
Pre-Press Ink Jet					
Epson T59/T60 Series Ink	--	20.00%	100.00%	77	0.01

Total VOC Emissions =	**7.86**	**Tons/yr**

METHODOLOGY

Maximum Line Speed = (Maximum Print Length (inches)*Maximum Press Impressions*(1 foot/12 inches)*(1 hour / 60 minutes)

Ink, Coating, and Fountain Solution Throughput =
Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year *0.5 = MMin^2 per Year

Solvent and Parts Washer Throughput =
Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year *0.2 = MMin^2 per Year

*Material coverage for ink and fountain solution is 1.5x actual material coverage; coverage for coatings, solvents, miscellaneous, and waste/recycled material is based on actual coverage

*Weight % Volatiles based on worst case material use

***Flash-off from 2006 USEPA CTG for Offset Lithographic Printing

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * Tons per 2

NOTE: SHEET-FED OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

(Source -USEPA Control Techniques Guideline for Offset Lithographic Printing, 2006, Page 19)

Appendix A: Emissions Calculations
Potential Emissions Summary
Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201
Registration Number: 097-27511-00657
Reviewer: Summer Keown
Date: March 24, 2009

Litho Press, Inc Potential-to-Emit HAP Emissions

Potential-to-Emit HAP Emissions, lbs/year

Emission Source	Material						
	Ink	*Coating*	*Fountain Solutuon*	*Cleaning Solvents*	*Miscellaneous*	*Other*	*Total*
MR-1	0.00	92.28	0.00	65.21	0.00	0.00	157
MR-2	0.00	160.62	0.00	113.50	0.00	0.00	274
MR-3	0.00	268.43	0.00	189.68	0.00	0.00	458
Other	0.00	0.00	0.00	0.00	0.00	3.09	3
Facility Total	0	521	0	368	0	3	893

Potential-to-Emit HAP Emissions, tons/year

Emission Source	Material						
	Ink	*Coating*	*Fountain Solutuon*	*Cleaning Solvents*	*Miscellaneous*	*Other*	*Total*
MR-1	-	0.05	-	0.03	-	0	0.08
MR-2	-	0.08	-	0.06	-	0	0.14
MR-3	-	0.13	-	0.09	-	0	0.23
Other	-	-	-	-	-	0.00	0.00
Facility Total	-	0.26	-	0.18	-	0.00	0.45

Potential-to-Emit Individual HAP Emissions, lbs/year

HAP	Source				
	MR-1	*MR-2*	*MR-3*	*Other*	*Total*
diethanolamine	92	161	268	0	521
xylene	33	57	95	0	184
cumene	33	57	95	0	184
ethylene glycol	0	0	0	3	3
Facility Total	157	274	458	3	893

Potential-to-Emit Individual HAP Emissions, tons/year

HAP	Source				
	MR-1	*MR-2*	*MR-3*	*Other*	*Total*
diethanolamine	0.05	0.08	0.13	0.00	0.26
xylene	0.02	0.03	0.05	0.00	0.09
cumene	0.02	0.03	0.05	0.00	0.09
ethylene glycol	0.00	0.00	0.00	0.00	0.00
Facilty Total	0.08	0.14	0.23	0.00	0.45

PRESS MR-1	Max Sheets per Hour	Max Print Area	Max Print Area (in^2)	Annual Operating Hours	Max Potential Million Square Inches ($MMin^2$)	Material Coverage ($lbs/MMin^2$)	Max HAP	Emission Factor	Potential HAP Emissions
Inks and Varnishes	12,000	28.3 x 41	1155	4,380	60,729	0.163	0.00% by wt	0.05	- lbs
Coatings	12,000	28.3 x 41	1155	4,380	60,729	0.061	2.50% by wt	1	92 lbs
diethanolamine	12,000	28.3 x 41	1155	4,380	60,729	0.061	2.50% by wt	1	92 lbs
Fountain Solutions	12,000	28.3 x 41	1155	4,380	60,729	0.022	0.00% by wt	1	- lbs
Solvents (press, blanket wash)	12,000	28.3 x 41	1155	1752	24,292	0.054	5.00% by wt	1	65 lbs
xylene	12,000	28.3 x 41	1155	1752	24,292	0.054	2.50% by wt	1	33 lbs
cumene	12,000	28.3 x 41	1155	1752	24,292	0.054	2.50% by wt	1	33 lbs
Miscellaneous	12,000	28.3 x 41	1155	1752	24,292	0.024	0.00% by wt	1	- lbs

PRESS MR-2	Max Sheets per Hour	Max Print Area	Max Print Area (in^2)	Annual Operating Hours	Max Potential Million Square Inches ($MMin^2$)	Material Coverage ($lbs/MMin^2$)	Max HAP	Emission Factor	Potential HAP Emissions
Inks and Varnishes	11,000	39.3 x 56	2194	4,380	105,711	0.163	0.00% by wt	0.05	- lbs
Coatings	11,000	39.3 x 56	2194	4,380	105,711	0.061	2.50% by wt	1	161 lbs
diethanolamine	11,000	39.3 x 56	2194	4,380	105,711	0.061	2.50% by wt	1	161 lbs
Fountain Solutions	11,000	39.3 x 56	2194	4,380	105,711	0.022	0.00% by wt	1	- lbs
Solvents (press, blanket wash)	11,000	39.3 x 56	2194	1752	42,284	0.054	5.00% by wt	1	114 lbs
xylene	11,000	39.3 x 56	2194	1752	42,284	0.054	2.50% by wt	1	57 lbs
cumene	11,000	39.3 x 56	2194	1752	42,284	0.054	2.50% by wt	1	57 lbs
Miscellaneous	11,000	39.3 x 56	2194	1752	42,284	0.024	0.00% by wt	1	- lbs

PRESS MR-3	Max Sheets per Hour	Max Print Area	Max Print Area (in^2)	Annual Operating Hours	Max Potential Million Square Inches ($MMin^2$)	Material Coverage ($lbs/MMin^2$)	Max HAP	Emission Factor	Potential HAP Emissions
Inks and Varnishes	11,000	50.8 x 72	3667	4,380	176,661	0.163	0.00% by wt	0.05	- lbs
Coatings	11,000	50.8 x 72	3667	4,380	176,661	0.061	2.50% by wt	1	268 lbs
diethanolamine	11,000	50.8 x 72	3667	4,380	176,661	0.061	2.50% by wt	1	268 lbs
Fountain Solutions	11,000	50.8 x 72	3667	4,380	176,661	0.022	0.00% by wt	1	- lbs
Solvents (press, blanket wash)	11,000	50.8 x 72	3667	1752	70,664	0.054	5.00% by wt	1	190 lbs
xylene	11,000	50.8 x 72	3667	1752	70,664	0.054	2.50% by wt	1	95 lbs
cumene	11,000	50.8 x 72	3667	1752	70,664	0.054	2.50% by wt	1	95 lbs
Miscellaneous	11,000	50.8 x 72	3667	1752	70,664	0.024	0.00% by wt	1	- lbs

REFERENCES
1. Annual operating hours assume 50% Printing / 20% Cleaning / 30% make ready
2. Material coverage for ink and fountain solution is 1.5x actual material coverage; coverage for coatings, solvents, and miscellaneous is based on actual coverage dat
3. MAX HAP from MSDS or personal communcation with supplier/vendo
4. 5% For Nonheatset Web Per 2006 CTG for Offset Lithography (EPA-453/R-06-002)
5.Waste solvent and recycled parts washer VOC content from Safety-Kleen waste profile
6. Potential HAP emissions = (Max Sheets per Hour * Max Print Area * Press Units * Annual Operating Hours * Material Coverage * Max HAP * Emission Factor)/100000

OTHER	Material Usage	MAX HAP		Emission Factor	Potential HAP Emissions	
Ink Jet Inks	77	4.00%	by wt	1	3.09	lbs
ethylene glycol	77	4.00%	by wt	1	3.09	lbs

REFERENCES
1. Max material use based on max ink consumption and scaled upwards to 876
2. HAP emissions = Material Usage * Max HAP * Emission Facto

Appendix A: Emissions Calculations

PM Potential to Emit

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201
Registration Number: 097-27511-00657
Reviewer: Summer Keown
Date: March 24, 2009

Litho Press, Inc Actual PM Emissions

Material	Manufacturer	Particle-Size	Actual Million Square Inches (in^2)	Material Distribution %	Usage	Emission Factor	PM Emissions (lbs/hour)	PM Emissions (lbs/year)	PM Emissions (tons/year)
MISCELLANEOUS									
Spray Powder	VARN	>10 microns							
MR-1			34,663	25.5%	76.6 lbs	0.8	0.01	61.3	0.03
MR-2			46,076	33.9%	101.8 lbs	0.8	0.01	81.5	0.04
MR-3			55,000	40.5%	121.6 lbs	0.8	0.01	97.2	0.05
Total			135,739		300.0 lbs			240.0	0.12

Litho Press, Inc Potential-to-Emit PM Emissions

Material	Manufacturer	Particle-Size	Actual Million Square Inches (in^2)	Material Distribution %	Usage	Emission Factor	PM Emissions (lbs/hour)	PM Emissions (lbs/year)	PM Emissions (tons/year)
MISCELLANEOUS									
Spray Powder	VARN	>10 microns							
MR-1			60,729	17.7%	134.2 lbs	0.8	0.01	107.4	0.05
MR-2			105,711	30.8%	233.6 lbs	0.8	0.02	186.9	0.09
MR-3			176,661	51.5%	390.4 lbs	0.8	0.04	312.4	0.16
Total			343,101		758.3 lbs		0.07	606.6	0.30

METHODOLOGY
PM Emissions (tons/year) = Usage (lbs) * Emission Factor * 1 ton/2000 lbs
PM Emissions are assumed to be equal to PM10 and PM2.5 emissions.