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: August 10, 2011

RE: Clondalkin Pharma and Healthcare / 163-30362-00097

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Clondalkin Pharma and Healthcare
1100 E Louisiana St
Evansville, Indiana 47711

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M163-30362-00097	
Issued by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 10, 2011 Expiration Date: August 10, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial lithographic printing facility.

Source Address:	1100 E Louisiana St, Evansville, Indiana 47711
General Source Phone Number:	(812) 464-2461
SIC Code:	2752 (Commercial Printing, Lithographic)
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset 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

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

(a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;

(b) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;

(c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;

(d) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;

(e) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;

(f) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;

(g) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;

(h) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;

(i) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;

(j) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M163-30362-00097, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

(c) 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.

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M163-30362-00097 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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
Permit Administration and Support Section, 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

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

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

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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.

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

(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 record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

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

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;

(b) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;

(c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;

(d) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;

(e) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;

(f) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;

(g) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;

(h) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;

(i) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;

(j) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

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

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

D.1.1 Organic Solvent Degreasing Operations [326 IAC 8-3-2]

Pursurant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, consipicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured

at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems demonstrated equivalent control such as a refrigerated chiller of carbon absorption. Such systems shall be submitted to the U. S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the printing presses (31, 41 through 44, and 06) and the parts washer (PW02). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Clondalkin Pharma and Healthcare
Address:	1100 E Louisiana St
City:	Evansville, Indiana 47711
Phone #:	(812) 464-2461
MSOP #:	M163-30362-00097

I hereby certify that Clondalkin Pharma and Healthcare is : ☐ still in operation.
☐ no longer in operation.

I hereby certify that Clondalkin Pharma and Healthcare is : ☐ in compliance with the requirements of MSOP M163-30362-00097.
☐ not in compliance with the requirements of MSOP M163-30362-00097.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Clondalkin Pharma and Healthcare
Source Location:	1100 E Louisiana St, Evansville, Indiana 47711
County:	Vanderburgh
SIC Code:	2752 (Commercial Printing, Lithographic)
Permit Renewal No.:	M163-30362-00097
Permit Reviewer:	Marcia Earl

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Keller Crescent Company, Inc. relating to the operation of a stationary commercial lithographic printing facility. On March 18, 2011, Keller Crescent Company, Inc. submitted an application to the OAQ requesting to renew its operating permit. Keller Crescent Company, Inc. was issued a MSOP M163-18502-00097 on September 12, 2006. On June 21, 2011 Keller Crescent Company, Inc. submitted a letter stating that as of June 13, 2011, their name changed to Clondalkin Pharma and Healthcare.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;

(b) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;

(c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;

(d) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;

(e) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;

(f) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;

(g) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;

(h) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;

(i) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;

(j) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

Emission Units Removed From the Source

The source has removed the following emission units:

(a) One (1) KBA Planeta non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1990, identified as 39, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S39. This unit was removed from service in August 2010; and

(b) One (1) Parts washer identified as PW01 with a capacity of thirty gallons. This unit was removed from service in 2009

Existing Approvals

The source has been operating under MSOP 163-18502-00097, issued on September 12, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, 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	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh 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 (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for $PM_{2.5}$. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and SO_2 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
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. 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, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	0.00
PM_{10}	0.00
$PM_{2.5}$	0.00
SO_2	0.00

Unrestricted Potential Emissions	
Pollutant	Tons/year
VOC	43.22
CO	0.00
CO_2e	0.00
NO_x	0.00

HAPs	**tons/year**
Xylene	3.84
Ethyl Benzene	0.72
Benzene	0.71
Hexane	0.15
all other HAPs	0.19
Total	**5.61**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (60.430 to 60.435) (326 IAC 12), are not included in this permit, because this NSPS applies only to rotogravure printing presses. This source uses non-heatset offset lithograph printing presses and a screen printing press.

(b) The requirements of the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (60.440 to 60.447) (326 IAC 12), are not included in this permit, because this source does not manufacture pressure sensitive tape and label materials.

(c) The requirements of the New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing Source, 40 CFR 60, Subpart FFF (60.580 to 60.585) (326 IAC 12), are not included in this permit, because this source does not print or coat flexible vinyl or urethane products.

(d) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (60.740 to 60.748) (326 IAC 12), are not included in this permit, because the source does not have a process which applies elastomers, polymers, or prepolymers to a supporting web .

(e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

(f) The requirements for the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, 40 CFR 63, Subpart S, (63.440 to 63.459) (326 IAC 20-33), are not included in this permit, because this source does not produce pulp, paper, or paperboard and is not a major source of HAPs.

(g) The requirements for the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 to 63.471) (326 IAC 20-6), are not included in this permit, because the source does not use halogenated solvents at this facility.

(h) The requirements for the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (63.820 to 63.839) (326 IAC 20-18), are not included in this permit, because this source does not contain rotogravure or wide-web flexographic printing presses and is not a major source of HAPs.

(i) The requirements for the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coatings, 40 CFR 63, Subpart JJJJ (63.3280 to 63.3420) (326 IAC 20-65), are not included in this permit, because this source is not a major source of HAPs and lithography and screenprinting are exempted from this rule under 40 CFR 63.3300(c).

(j) The requirements for the National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO (63.4280 to 63.4371) (326 IAC 20-77), are not included in this permit, because the source is not a major source of HAPs and does not do printing on fabric or other textiles.

(k) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

(l) 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 - Entire Source

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

This existing source is not one of the twenty-eight (28) listed source categories as defined in 326 IAC 2-2-1(gg)(1) and the potential to emit of all criteria pollutants are less than 250 tons per year. Therefore, this source is a PSD minor source and not subject to 326 IAC 2-2.

326 IAC 2-4.1 (New Source of Hazardous Air Permits)

The potential to emit HAPs from this existing source is less than 10 tons per year for a single HAP and less than 25 tons per year of any combination HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not included in this permit.

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.

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.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source does not have fugitive emissions exceeding twenty-five (25) tons per year.

State Rule Applicability – Individual Facilities

Printing Presses

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

The seven (6) printing presses (31, 41 through 44, and 06 are not subject to 326 IAC 6-3-2, because the seven (6) printing presses (31, 41 through 44, and 06) are not sources of particulate emission.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The seven (6) printing presses (31, 41 through 44, and 06) are not subject to 326 IAC 8-1-6, because the potential to emit (PTE) of VOCs from each press is less than 25 tons per year.

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

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990, located in any county, and with the potential to emit greater than fifteen (15) pounds of VOC per day before add-on controls. Each of the printing presses at this source is not subject to 326 IAC 8-2-5, since they each have a unrestricted potential to emit VOC of less than 15 pounds per day.

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

This source is not subject to 326 IAC 8-5-5 (Graphic Arts Operations), because the printing presses (31, 41 through 44, and 06) are not rotogravure and flexographic printing presses. The printing presses at this source are non-heatset offset lithographic printing presses (presses 31 and 41 through 44) and a screen printing press (press 06).

326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)

This souce is not subject to 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing), because this source is not located in Lake or Porter County. This source is located in Vanderburgh County.

Parts Washer (PW02)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The parts washer (PW02) is not subject to 326 IAC 8-1-6, because the potential to emit (PTE) of VOCs from each the parts washer (PW02) is less than 25 tons per year.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursurant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, consipicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems demonstrated equivalent control such as a refrigerated chiller of carbon absorption. Such systems shall be submitted to the U. S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The potential to emit VOC is less than 100 tons per year, this source was constructed after January 1, 1980 and is not located in Lake or Marion County. Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 8-17 (Industrial Solvent Cleaning Operations)

This source is not subject to 326 IAC 8-17 (Industrial Solvent Cleaning Operations), because this source is not located in Lake or Porter County. This source is located in Vanderburgh County.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on March 18, 2011.

Conclusion

The operation of this stationary commercial lithographic printing facility shall be subject to the conditions of the attached MSOP Renewal No. M163-30362-00097.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.

(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: Emission Summary

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Uncontrolled Emissions

Emission Units	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO	NOx	Total HAPs	Worst Case Single HAP	
Press 41	0.00	0.00	0.00	0.00	0.03	0.00	0.00	4.83	3.06	(xylene)
Press 42	0.00	0.00	0.00	0.00	0.05	0.00	0.00			
Press 43	0.00	0.00	0.00	0.00	0.06	0.00	0.00			
Press 44	0.00	0.00	0.00	0.00	0.03	0.00	0.00			
Press 06	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
Press 31	0.00	0.00	0.00	0.00	0.05	0.00	0.00			
Solvents (printing presses)	0.00	0.00	0.00	0.00	42.96	0.00	0.00	0.78	0.78	(xylene)
Parts Washer (PW02)	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.00	
Total	**0.00**	**0.00**	**0.00**	**0.00**	**43.22**	**0.00**	**0.00**	**5.61**	**3.84**	**(xylene)**

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
41	415	29	75907

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	75907	0.02
CK-3166***	0.008044	57%	5.00%	75907	0.01

Total VOC Emissions =	0.03	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
42	506	40	127658

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks*** CK-3166***	0.041837 0.008044	25% 57%	5.00% 5.00%	127658 127658	0.03 0.01

Total VOC Emissions =	0.05	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year)] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput

Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
43	583	40	147084

Ink VOCs

Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	147084	0.04
CK-3166***	0.008044	57%	5.00%	147084	0.02

Total VOC Emissions =	0.06	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
44	415	29	75907

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks*** CK-3166***	0.041837 0.008044	25% 57%	5.00% 5.00%	75907 75907	0.02 0.01

Total VOC Emissions =	0.03	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
06 - UV Screen	92	47	27272

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Corkure 1145HG5	0.008044	0%	80.00%	27272	0.00

Total VOC Emissions =	0.00	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
This press uses UV lights (lamps) that act as drying agent for the UV Inks.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 80% flash off factor reflects 20% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
31	506	40	127658

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off %[1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks*** CK-3166***	0.041837 0.008044	25% 57%	5.00% 5.00%	127658 127658	0.03 0.01

Total VOC Emissions =	0.05	Ton/yr

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)
***This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

METHODOLOGY

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A Emission Calculations
HAPs from Printing Press Operations

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

MSDS #	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Methyl Chloroform	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methylene Chloride	Weight % Ethylene Oxide	Weight % Cumene
87	Film Kleen	6.00	55.00	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	87.22%	0.00%	0.00%	0.00%	0.00%
311	Type Wash 3565	7.26	10.00	0.00016	0.00%	0.00%	67.44%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
556	FN-6 Plate Gum	9.17	212.00	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00%
563	SK300 Statikill	5.84	3.16	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%
689	Silikone Spray	8.17	6.72	0.00080	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%
817	SG Storage Gum	8.92	6.00	0.00070	1.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1001	24726 Yellow Enamel	8.34	1.50	0.00020	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2058	HQ Developer/Replenisher	8.34	34.88	0.00400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2095	FP Cleaner IV	8.34	125.00	0.01400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%
2137	Anti-Skin Ink Spray	8.67	7.31	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%
2246	107 Scratch Remover	8.34	12.00	0.00100	1.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%
2257	MRC Fast-Alt 7666	6.00	2420.00	0.00016	7.00%	30.00%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%

MSDS #	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Chloroform Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Ethylene Oxide Emissions (ton/yr)	Cumene Emissions (ton/yr)	Total HAPs (ton/yr)
87	Film Kleen	6.00	55.00	0.00011	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00	0.00	0.14
311	Type Wash 3565	7.26	10.00	0.00016	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
556	FN-6 Plate Gum	9.17	212.00	0.00011	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.03
563	SK300 Statikill	5.84	3.16	0.00011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
689	Silikone Spray	8.17	6.72	0.00080	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.03	0.00	0.00	0.06
817	SG Storage Gum	8.92	6.00	0.00070	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1001	24726 Yellow Enamel	8.34	1.50	0.00020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2058	HQ Developer/Replenisher	8.34	34.88	0.00400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2095	FP Cleaner IV	8.34	125.00	0.01400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.06
2137	Anti-Skin Ink Spray	8.67	7.31	0.00011	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01
2246	107 Scratch Remover	8.34	12.00	0.00100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
2257	MRC Fast-Alt 7666	6.00	2420.00	0.00016	0.71	3.06	0.00	0.00	0.71	0.00	0.00	0.00	0.00	0.00	4.48
				Totals	0.72	3.06	0.03	0.03	0.71	0.15	0.03	0.03	0.06	0.00	4.83

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and HAP From Solvents Usage in Printing Press Operation

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

Throughput

Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/YEAR
44	415	29	75907
41	415	29	75907
31	506	40	127658
42	506	40	127658
43	583	40	147084

Solvent VOCs/HAPs

Press I.D.	Solvent I.D.	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % [1]	Throughput (MMin^2/Year)	VOC Emissions (tons/yr)	Worst Case HAP	Worst Case Percent HAP (%)	HAP Emissions (tons/yr)
44	Quality Wash	0.201434	100%	100.00%	75907	7.65	Xylene	1.40%	0.11
41	Quality Wash	0.201434	100%	100.00%	75907	7.65	Xylene	1.40%	0.11
31	Quality Wash	0.201434	100%	100.00%	127658	12.86	Xylene	1.40%	0.18
42	Quality Wash	0.201434	100%	100.00%	127658	12.86	Xylene	1.40%	0.18
43	Quality Wash	0.201434	100%	100.00%	147084	14.81	Xylene	1.40%	0.21
					Totals	42.96			0.78

*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)

METHODOLOGY:

Throughput (Mmin^2/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin^2)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin^2/year] * [ton/2000 lbs]
HAP Emissions (tons/yr) = [VOC Emissions (ton/yr)] * [Worst Case Percent HAP (%)]

Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

[1] the 100% flash off factor reflects 0% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

Appendix A: Emissions Calculations
PARTS WASHER (PW02)

Company Name: Clondalkin Pharma and Healthcare
Source Address: 1100 E Louisiana St, Evansville, Indiana 47711
Permit Number: M163-30362-00097
Reviewer: Marcia Earl
Date: March 2011

POTENTIAL EMISSIONS

Wash Solution Tank Size	30	gallons
Solution Life	13	weeks
Annual Wash Solution Usage	120	gallons/yr
Percent VOC in Wash Solution	100.00%	
Annual VOC Usage	120	gallons/yr
VOC Density	0.78	lbs/gal
VOC Emission	93.60	lbs/yr
VOC Emission	0.05	tons/yr

METHODOLOGY

Annual Wash Solution Usage (gallons/yr) = [Wash Solution Tank Size (gallons)] / [Solution Life (weeks)] * [52 weeks/year]
Annual VOC Usage (gallons/yr) = [Annual Wash Solution Usage (gallons/yr)] * [Pecent VOC in Wash Solution]
VOC Emission (lbs/yr) = [Annual VOC Usage (gallons/yr)] * [VOC Density (lbs/gal)]
VOC Emission (tons/yr) = [VOC Emission (lbs/yr)] * [ton/2000 lbs]
Wash solution is Mineral Spirits

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Betty Lantaff
Clondalkin Pharma and Healthcare
1100 E Louisiana St
Evansville, IN 47711

DATE: August 10, 2011

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

SUBJECT: Final Decision
MSOP
163-30362-00097

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Chris Feagans Responsible Official
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

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

August 10, 2011

TO: Evansville Vanderburg Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: **Clondalkin Pharma & Healthcare**
Permit Number: **163-30362-00097**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 8/10/2011 Clondalkin Pharma & Healthcare 163-30362-00097 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee / Remarks
1		Betty Lantaff Clondalkin Pharma & Healthcare 1100 E Louisiana St Evansville IN 47711 (Source CAATS) via confirmed delivery									
2		Chris Feagans Exec VP Production & Operating Svcs Clondalkin Pharma & Healthcare 1100 E Louisiana St Evansville IN 47711 *(RO CAATS)*									
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)*									
4		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
5		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 *(Library)*									
6		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 *(Affected Party)*									
7		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
8		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
9		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 *(Affected Party)*									
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
11		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 *(Local Official)*									
12											
13											
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