**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: December 7, 2011

RE: PCI Holidings / 097 - 31137 - 00298

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

# Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

If you have technical questions regarding the enclosed documents, please contact the 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-AM.dot12/3/07

IDEM

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December 7, 2011

Tony Cirabisi
PCI Holdings, LLC
2457 East Washington Street
Indianapolis, IN 46201-4155

Re: 097-31137-00298
Second Administrative Amendment to
F097-24229-00298

Dear Mr. Cirabisi:

PCI Holdings, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Second Renewal No. F097-24229-00298 on October 26, 2007 for a stationary lithographic printing operation located at 2457 East Washington Street, Indianapolis, Indiana 46201. PCI Holdings, LLC was issued a First Administrative Amendment No. 097-27863-00298 on June 16, 2009, and a Minor Permit Revision No. 097-29961-00298 on January 12, 2011.

Administrative Amendment

On November 10, 2011 the Office of Air Quality (OAQ) received an application from the source relating to the removal of one drying oven (DO-2) and four lithographic printing presses (EU-1, EU-7, EU-12, and EU-14) and also relating to the construction and operation of two new lithographic printing presses of the same type and will comply with the same applicable requirements and permit terms and conditions as the existing lithographic printing presses. The potential to emit of the new Komori, 4-color sheetfed offset lithographic press, identified as EU-17, is 19.58 tons VOC per year. The potential to emit of the new Komori, 6-color sheetfed offset lithographic press, identified as EU-18, is 14.99 tons VOC per year (see Appendix A - Emissions Calculations). The addition of these units to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(14). The entire source will continue to limit VOC emissions from the printing presses (Emissions Units EU-9, EU-11, EU-13, EU-15, EU-16, EU-17, and EU-18) to 98.1 tons per twelve (12) consecutive month period and the entire source to less than 100 tons VOCs per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3.

Upon further review, IDEM, OAQ has decided to add the already existing ten (10) space heater emission units to Section A.3 - Insignificant Activities of the permit. The potential to emit (PTE) for the ten (10) space heaters has previously been included in source-wide PTE calculations, and the addition of these units to the permit does not change any permit terms and conditions. This change to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(2).

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

(1) Sections A.2 and A.3 have been changed to indicate the updated emission unit and insignificant activities at the source.

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

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

~~(a) Heidelberg MO nonheatset sheetfed lithographic press, identified as Emissions Unit EU-1, with a maximum capacity of 2,375,000 square inches per hour, constructed in 1992, and exhausting to the interior of the building.~~

~~(b) Diddie Glaser nonheatset web lithographic press, identified as Emissions Unit EU-7, with a maximum capacity of 7,560,000 square inches per hour, constructed in 1965, and exhausting to the interior of the building.~~

(~~c~~a) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(~~d~~b) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

~~(e) King Press Newscolor IV nonheatset lithographic web press, identified as Emissions Unit EU-12, with a maximum capacity of 46,448,640 square inches per hour, constructed in 2001, and exhausting to the interior of the building.~~

(~~f~~c) Heidelberg V-3~~0~~1 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

~~(g) Harris M300 heatset web lithographic press, identified as Emissions Unit EU-14, with a maximum capacity of 25,920,000 square inches per hour, constructed in 2004, and exhausting to stack SV-6.~~

(~~h~~d) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

(~~i~~e) Harris M110 heatset web lithographic printing press, identified as EU-16, with a maximum capacity of 860 feet per minute, approved for construction in 2010, exhausting to stack SV-1.

**(f) Komori, 4-color sheetfed offset lithographic press, identified as EU-17, with a maximum capacity of 661 feet per minutes, constructed in 2011, and exhausting to the interior of the building.**

**(g) Komori, 6-color sheetfed offset lithographic press, identified as EU-18, with a maximum capacity of 506 feet per minute, approved for constructed in 2011, and exhausting to the interior of the building.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than 10 million (1,000,000) Btu per hour.

(1) ~~Drying Oven DO-2, with a maximum heat input capacity of 1.0 MMBtu/hr.~~ **Reserved.**

...

**(8) Ten (10) natural gas-fired space heaters, with a total maximum heat input capacity of 1.38 MMBtu/hr.**

...

(2) Section D.1 has been revised to reflect the new emission units and to include EU-17 and EU-18 in the permit emission limitations and standards..

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

~~(a) Heidelberg MO nonheatset sheetfed lithographic press, identified as Emissions Unit EU-1, with a maximum capacity of 2,375,000 square inches per hour, constructed in 1992, and exhausting to the interior of the building.~~

~~(b) Diddie Glaser nonheatset web lithographic press, identified as Emissions Unit EU-7, with a maximum capacity of 7,560,000 square inches per hour, constructed in 1965, and exhausting to the interior of the building.~~

(~~c~~**a**) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(~~d~~**b**) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

~~(e) King Press Newscolor IV nonheatset lithographic web press, identified as Emissions Unit EU-12, with a maximum capacity of 46,448,640 square inches per hour, constructed in 2001, and exhausting to the interior of the building.~~

(~~f~~**c**) Heidelberg V-3~~0~~**1** heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

~~(g) Harris M300 heatset web lithographic press, identified as Emissions Unit EU-14, with a maximum capacity of 25,920,000 square inches per hour, constructed in 2004, and exhausting to stack SV-6.~~

(~~h~~**d**) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

(~~i~~**e**) Harris M110 heatset web lithographic printing press, identified as EU-16, with a maximum capacity of 860 feet per minute, approved for construction in 2010, exhausting to stack SV-1.

**(f) Komori, 4-color sheetfed offset lithographic press, identified as EU-17, with a maximum capacity of 661 feet per minutes, constructed in 2011, and exhausting to the interior of the building.**

**(g) Komori, 6-color sheetfed offset lithographic press, identified as EU-18, with a maximum capacity of 506 feet per minute, approved for constructed in 2011, and exhausting to the interior of the building.**

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

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

D.1.1 Volatile Organic Compounds (VOC) FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-3]

VOC emissions from Emissions Units ~~EU-1, EU-7~~, EU-9, EU-11, ~~EU-12~~, EU-13, ~~EU-14~~, EU-15, ~~and~~ EU-16, **EU-17, and EU-18** shall be limited to less than ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this requirement will limit source-wide VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-3 (Emission Offset) not applicable.

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

(a) VOC emissions from Emissions Units EU-9, EU-13, ~~EU-14,~~ EU-15, and EU-16, individually, shall be less than twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 not applicable.

(b) Any change or modification which may increase the potential emissions of VOC from Emissions Units ~~EU-1, EU-7,~~ EU-11, **EU-17, or EU-18** ~~or EU-12~~ to twenty-five (25) or more tons per twelve (12) consecutive month period, each, must be approved by the IDEM, OAQ before any such change may occur. This will render the requirements of 326 IAC 8-1-6 not applicable.

...

**Compliance Determination Requirements**

D.1.4 VOC Emissions

...

(c) Compliance with Conditions D.1.1 and D.1.2 shall be determined using the following equations for VOC emissions. The total VOC emissions calculated shall be the sum of each material used on each individual printing press. Compliance with this limit will be demonstrated by using the following equations:

Heatset Presses (EU-9, EU-13, ~~EU-14,~~ EU-15, and EU-16)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 80% for inks and 100% for all other materials)

Non-Heatset Presses (~~EU-1, EU-7,~~ EU-11, **EU-17, and EU-18** ~~and EU-12~~)

$$En = Un \times Vn \times F$$

Where:
En = VOC emissions from each press

Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 5% for inks and 100% for all other materials)

Total VOC Emissions from all presses

Et = ~~En(EU-1) + En(EU-7) +~~ En(EU-9) + En(EU-11) ~~+ En(EU-12)~~ +
En(EU-13) ~~+ En(EU-14)~~ + En(EU-15) + En(EU-16) **+ En(EU-17)**
**+ En(EU-18)**

Where:
Et = VOC emissions from all presses

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

D.1.5 Record Keeping Requirements

...

(5) The combined total weight of VOC emitted for each compliance period for Emissions Units ~~EU-1, EU-7,~~ EU-9, EU-11, ~~EU-12,~~ EU-13, ~~EU-14,~~ EU-15~~, and~~ EU-16**, EU-17 and EU-18**; and

(6) The weight of VOC emitted for each compliance period for each press (Emissions Units EU-9, EU-13, ~~EU-14,~~ EU-15 and EU-16).

...

(3) The Quarterly Reports have been revised as follows:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**
**Quarterly Report**

Source Name: PCI Holdings, LLC
Source Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298
Facility: EU-9, EU-13, ~~EU-14,~~ EU-15, and EU-16
Parameter: VOC Emissions
Limit: VOC emissions from Emissions Units EU-9, EU-13, ~~EU-14,~~ EU-15, and EU-16, individually, shall be limited to less than twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Units | Column 1<br>VOC Emissions<br>This Month | Column 2<br>VOC Emissions<br>Previous 11 Months | Column 1 + Column 2<br>VOC Emissions<br>12 Month Total |
|---|---|---|---|---|
| Month 1 | EU-9 | | | |
| | EU-13 | | | |
| | ~~EU-14~~ | | | |
| | EU-15 | | | |
| | EU-16 | | | |

| | | | | |
|---|---|---|---|---|
| Month 2 | EU-9 | | | |
| | EU-13 | | | |
| | ~~EU-14~~ | | | |
| | EU-15 | | | |
| | EU-16 | | | |
| Month 3 | EU-9 | | | |
| | EU-13 | | | |
| | ~~EU-14~~ | | | |
| | EU-15 | | | |
| | EU-16 | | | |

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on_____

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

...

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**
**Quarterly Report**

| | |
|---|---|
| Source Name: | PCI Holdings, LLC |
| Source Address: | 2457 East Washington Street, Indianapolis, IN 46201 |
| FESOP Permit No.: | F097-24229-00298 |
| Facility: | ~~EU-1, EU-7,~~ EU-9, EU-11, ~~EU-12,~~ EU-13, ~~EU-14,~~ EU-15, ~~and~~ EU-16**, EU-17, and EU-18** |
| Parameter: | Total VOC Emissions |
| Limit: | VOC emissions from Emissions Units ~~EU-1, EU-7,~~ EU-9, EU-11, ~~EU-12,~~ EU-13, ~~EU-14,~~ EU-15, ~~and~~ EU-16**, EU-17, and EU-18** shall be limited to less than ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month |

...

Greenhouse Gases

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO2 equivalent emissions (CO2e). Therefore, CO2e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO2e per year (see Appendix A for detailed calculations). This requires the following changes to the permit.

IDEM, OAQ has revised Section C.2 Overall Source Limit as follows. IDEM, OAQ made the following revisions with deleted language as ~~strikeouts~~ and new language **bolded**.

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) **and greenhouse gases (GHGs)**, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

**(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period.**

...

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Sarah Street, of my staff, at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit
Appendix A - Emissions Calculations

IC/ss

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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# Federally Enforceable State Operating Permit Renewal
# OFFICE OF AIR QUALITY

## PCI Holdings, LLC
## 2457 East Washington Street
## Indianapolis, Indiana 46201

(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.

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

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

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

| Operation Permit No.: F097-24229-00298 | |
|---|---|
| ORIGINAL SIGNED BY:<br>Felicia A. Robinson, Administrator<br>Office of Environmental Services | Issuance Date: October 26, 2007<br><br>Expiration Date: October 26, 2017 |

First Administrative Amendment No.: 097-27863-00298, issued on June 16, 2009
First Minor Permit Revision No.: 097-29961-00298, issued on January 12, 2011

| Second Administrative Amendment No.: 097-31137-00298 | |
|---|---|
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date:<br>December 7, 2011<br><br>Expiration Date: October 26, 2017 |

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary lithographic printing operation.

| | |
|---|---|
| Source Address: | 2457 East Washington Street, Indianapolis, IN 46201 |
| General Source Phone Number: | (317) 266-8208 |
| SIC Code: | 2759 |
| County Location: | Marion |
| Source Location Status: | Nonattainment for PM 2.5 standard<br>Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD, Emission Offset Rules and Nonattainment NSR<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

(a) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(b) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(c) Heidelberg V-3~~0~~1 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

(d) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

(e) Harris M110 heatset web lithographic printing press, identified as EU-16, with a maximum capacity of 860 feet per minute, approved for construction in 2010, exhausting to stack SV-1.

(f) Komori, 4-color sheetfed offset lithographic press, identified as EU-17, with a maximum capacity of 661 feet per minutes, constructed in 2011, and exhausting to the interior of the building.

(g) Komori, 6-color sheetfed offset lithographic press, identified as EU-18, with a maximum capacity of 506 feet per minute, approved for constructed in 2011, and exhausting to the interior of the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than 10 million (1,000,000) Btu per hour.

(1) *Reserved.*

(2) Drying Oven DO-9, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) Drying Oven DO-13, with a maximum heat input capacity of 1.0 MMBtu/hr.

(4) Drying Oven DO-14, with a maximum heat input capacity of 1.0 MMBtu/hr.

(5) Two (2) Drying Ovens DO-15A and DO-15B, with a maximum heat input capacity of 1.0 MMBtu/hr each.

(6) Oxidizer OX-1, with a maximum heat input capacity of 0.88 MMBtu/hr, used as a voluntary control device for the presses.

(7) One (1) natural gas-fired drying oven, identified as DO-16, with a maximum heat input capacity of 1.30 MMBtu/hr, approved for construction in 2010.

(8) Ten (10) natural gas-fired space heaters, with a total maximum heat input capacity of 1.38 MMBtu/hr.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(c) PrePress Area.

(d) Ryobi lithographic nonheatset sheet fed press.

(e) Kodak direct press.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

## SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F097-24229-00298, 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 [326 IAC 2-8-6] [IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F097-24229-00298 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

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

(a) 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

(b) Unless otherwise specified in this permit, 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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) Heidelberg V-30 heatset lithographic web press, identified as Emissions Unit EU-9, with a maximum capacity of 27,086,400 square inches per hour, constructed in 1998, and exhausting to stack SV-2.

(b) King Press Print King IV nonheatset lithographic web press, identified as Emissions Unit EU-11, with a maximum process capacity of 16,381,440 square inches per hour, constructed in 2001, and exhausting to the interior of the building.

(c) Heidelberg V-3~~0~~1 heatset lithographic web press, identified as Emissions Unit EU-13, with a maximum capacity of 27,086,400 square inches per hour, constructed in 2003, and exhausting to stack SV-5.

(d) Harris M130 web heatset offset lithographic press, identified as Emissions Unit EU-15, with a maximum capacity of 37,319,040 square inches per hour, constructed in 2005, and exhausting to stack SV-7.

(e) Harris M110 heatset web lithographic printing press, identified as EU-16, with a maximum capacity of 860 feet per minute, approved for construction in 2010, exhausting to stack SV-1.

(f) Komori, 4-color sheetfed offset lithographic press, identified as EU-17, with a maximum capacity of 661 feet per minutes, constructed in 2011, and exhausting to the interior of the building.

(g) Komori, 6-color sheetfed offset lithographic press, identified as EU-18, with a maximum capacity of 506 feet per minute, approved for constructed in 2011, and exhausting to the interior of the building.

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

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

D.1.1 Volatile Organic Compounds (VOC) FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-3]

VOC emissions from Emissions Units EU-9, EU-11, EU-13, EU-15, EU-16, EU-17, and EU-18 shall be limited to less than ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this requirement will limit source-wide VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-3 (Emission Offset) not applicable.

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

(a) VOC emissions from Emissions Units EU-9, EU-13, EU-15, and EU-16, individually, shall be less than twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This renders the requirements of 326 IAC 8-1-6 not applicable.

(b) Any change or modification which may increase the potential emissions of VOC from Emissions Units EU-11, EU-17, or EU-18 to twenty-five (25) or more tons per twelve (12) consecutive month period, each, must be approved by the IDEM, OAQ before any such change may occur. This will render the requirements of 326 IAC 8-1-6 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

D.1.4 VOC Emissions

(a) Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.

(c) Compliance with Conditions D.1.1 and D.1.2 shall be determined using the following equations for VOC emissions. The total VOC emissions calculated shall be the sum of each material used on each individual printing press. Compliance with this limit will be demonstrated by using the following equations:

Heatset Presses (EU-9, EU-13, EU-15, and EU-16)

En = Un x Vn x F

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 80% for inks and 100% for all other materials)

Non-Heatset Presses (EU-11, EU-17, and EU-18)

En = Un x Vn x F

Where:
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
(F = 5% for inks and 100% for all other materials)

Total VOC Emissions from all presses

Et = En(EU-9) + En(EU-11) + En(EU-13) + En(EU-15)
+ En(EU-16) + En(EU-17) + En(EU-18)

Where:
Et = VOC emissions from all presses

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used;

(2) The amount of coating material and solvent less water used on monthly basis;

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

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The combined total weight of VOC emitted for each compliance period for Emissions Units EU-9, EU-11, EU-13, EU-15, EU-16, EU-17, and EU-18; and

(6) The weight of VOC emitted for each compliance period for each press (Emissions Units EU-9, EU-13, EU-15 and EU-16).

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: PCI Holdings, LLC
Source Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298

**This form consists of 2 pages** **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**
**Quarterly Report**

Source Name: PCI Holdings, LLC
Source Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298
Facility: EU-9, EU-13, EU-15, and EU-16
Parameter: VOC Emissions
Limit: VOC emissions from Emissions Units EU-9, EU-13, EU-15, and EU-16, individually, shall be limited to less than twenty-five (25.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR:_____

| Month | Units | Column 1<br>VOC Emissions<br>This Month | Column 2<br>VOC Emissions<br>Previous 11 Months | Column 1 + Column 2<br>VOC Emissions<br>12 Month Total |
|---|---|---|---|---|
| Month 1 | EU-9 | | | |
| | EU-13 | | | |
| | EU-15 | | | |
| | EU-16 | | | |
| Month 2 | EU-9 | | | |
| | EU-13 | | | |
| | EU-15 | | | |
| | EU-16 | | | |
| Month 3 | EU-9 | | | |
| | EU-13 | | | |
| | EU-15 | | | |
| | EU-16 | | | |

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on_____

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**
**Quarterly Report**

Source Name: PCI Holdings, LLC
Source Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298
Facility: EU-9, EU-11, EU-13, EU-15, EU-16, EU-17, and EU-18
Parameter: Total VOC Emissions
Limit: VOC emissions from Emissions Units EU-9, EU-11, EU-13, EU-15, EU-16, EU-17, and EU-18 shall be limited to less than ninety-eight and one-tenth (98.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month

QUARTER: _____ YEAR:_____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | VOC Emissions This Month | VOC Emissions Previous 11 Months | VOC Emissions 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

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

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

Source Name: PCI Holdings, LLC
Source Address: 2457 East Washington Street, Indianapolis, IN 46201
FESOP Permit No.: F097-24229-00298

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



This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

**Appendix A: Emission Calculations**
**Summary**

**Company Name:** PCI Holdings, LLC
**Address:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| | Uncontrolled Potential To Emit (tons/year) | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Process/emission unit | PM | PM10 | PM2.5 | $SO_2$ | NOx | VOC | CO | GHGs as CO2e | Single HAP | | Total HAPs |
| Printing Press EU-9 | - | - | - | - | - | 117.49 | - | - | 0.43 | Ethylene Glycol | 0.55 |
| Printing Press EU-11 | - | - | - | - | - | 4.33 | - | - | 0.10 | Ethylene Glycol | 0.21 |
| Printing Press EU-13 | - | - | - | - | - | 71.95 | - | - | 0.23 | Ethylene Glycol | 0.29 |
| Printing Press EU-15 | - | - | - | - | - | 159.51 | - | - | 0.23 | Ethylene Glycol | 0.35 |
| Printing Press EU-16 | - | - | - | - | - | 30.05 | - | - | 0.08 | Ethylene Glycol | 0.13 |
| Printing Press EU-17 | - | - | - | - | - | 19.58 | - | - | 0.44 | Xylene | 0.97 |
| Printing Press EU-18 | - | - | - | - | - | 14.99 | - | - | 0.34 | Xylene | 0.74 |
| Kodak Press EU-D1 | - | - | - | - | - | 1.53 | - | - | 0.01 | Xylene | 0.01 |
| Ryobi Press 3302 | - | - | - | - | - | 0.03 | - | - | negl. | | 1.35E-03 |
| Natural Gas Combustion | 0.10 | 0.39 | 0.39 | 0.03 | 5.09 | 0.28 | 4.27 | 6,144 | 0.09 | Hexane | 0.10 |
| **Totals** | **0.10** | **0.39** | **0.39** | **0.03** | **5.09** | **419.75** | **4.27** | **6,144** | **1.07** | **Ethylene Glycol** | **3.35** |

| | Limited Potential To Emit (tons/year) | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Process/emission unit | PM | PM10 | PM2.5 | $SO_2$ | NOx | VOC | CO | GHGs as CO2e | Single HAP | | Total HAPs |
| Printing Press EU-9 | - | - | - | - | - | <98.1 | - | - | 0.43 | Ethylene Glycol | 0.55 |
| Printing Press EU-11 | - | - | - | - | - | | - | - | 0.10 | Ethylene Glycol | 0.21 |
| Printing Press EU-13 | - | - | - | - | - | | - | - | 0.23 | Ethylene Glycol | 0.29 |
| Printing Press EU-15 | - | - | - | - | - | | - | - | 0.23 | Ethylene Glycol | 0.35 |
| Printing Press EU-16 | - | - | - | - | - | | - | - | 0.08 | Ethylene Glycol | 0.13 |
| Printing Press EU-17 | - | - | - | - | - | | - | - | 0.44 | Xylene | 0.97 |
| Printing Press EU-18 | - | - | - | - | - | | - | - | 0.34 | Xylene | 0.74 |
| Kodak Press EU-D1 | - | - | - | - | - | 1.53 | - | - | 0.01 | Xylene | 0.01 |
| Ryobi Press 3302 | - | - | - | - | - | 0.03 | - | - | negl. | 0.00 | 0.00 |
| Natural Gas Combustion | 0.10 | 0.39 | 0.39 | 0.03 | 5.09 | 0.28 | 4.27 | 6,144 | 0.09 | Hexane | 0.10 |
| **Totals** | **0.10** | **0.39** | **0.39** | **0.03** | **5.09** | **99.94** | **4.27** | **6,144** | **1.07** | **Ethylene Glycol** | **3.35** |

**Appendix A: Emissions Calculations**
**Printing Press EU-9**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed (feet/min) | Maximum Print Area ($Inches^2$) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| EU-9: Heidelberg V-30 heatset lithographic web 27,086,400 $inches^2$ per hour | 1,045 | 36 | 237,277 |

**VOC Emissions**

| Product Name | Maximum Coverage (lbs/$MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 3.25 | 37.0% | 80.0% | 237,277 | 114.13 |
| Prisco 530 Fountain Soln | 0.13 | 6.8% | 100.0% | 237,277 | 1.05 |
| MRC-K Blanket Cleaner | 0.02 | 97.3% | 100.0% | 237,277 | 2.31 |
| **Total** | | | | | **117.49** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage (lbs/$MMin^2$) | HAP Content (wt%) | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.13 | 2.8% | 237,277 | 0.43 |
| MRC-K Blanket Cleaner | Cumene | 0.02 | 2.5% | 237,277 | 0.06 |
| | Xylene | 0.02 | 2.5% | 237,277 | 0.06 |
| **Total** | | | | | **0.55** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage (lbs/$MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance *throughput and actual usage*

**Appendix A: Emissions Calculations**
**Printing Press EU-11**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed (feet/min) | Maximum Print Width (Inches) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| EU-11: King Press, Print King IV nonheatset lithographic web 16,381,440 $inches^2$ per hour | 632 | 36 | 143,501 |

| VOC Emissions | | | | | |
|---|---|---|---|---|---|
| **Product Name** | **Maximum Coverage ($lbs/MMin^2$)** | **Weight % Volatiles** | **Flash Off %** | **Max. Throughput ($MMin^2$/Year)** | **Potential to Emit (Tons/Year)** |
| Braden Sutphin Inks (Coldset) | 4.00 | 13.9% | 5.0% | 143,501 | 1.99 |
| Prisco 530 Fountain Soln | 0.05 | 6.8% | 100.0% | 143,501 | 0.24 |
| MRC-K Blanket Cleaner | 0.03 | 97.3% | 100.0% | 143,501 | 2.09 |
| **Total** | | | | | **4.33** |

| HAP Emissions | | | | | |
|---|---|---|---|---|---|
| **Product Name** | **HAP** | **Maximum Coverage ($lbs/MMin^2$)** | **HAP Content (wt%)** | **Max. Throughput ($MMin^2$/Year)** | **Potential to Emit (Tons/Year)** |
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.05 | 2.8% | 143,501 | 0.10 |
| MRC-K Blanket Cleaner | Cumene | 0.03 | 2.5% | 143,501 | 0.05 |
| | Xylene | 0.03 | 2.5% | 143,501 | 0.05 |
| **Total** | | | | | **0.21** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage ($lbs/MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Printing Press EU-13**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed<br>(feet/min) | Maximum Print Width<br>(Inches) | Maximum PTE<br>($MMin^2$/Year) |
|---|---|---|---|
| EU-13: Heidelberg V-31 heatset lithographic web 27,086,400 $inches^2$ per hour | 1,045 | 36 | 237,277 |

**VOC Emissions**

| Product Name | Maximum Coverage<br>(lbs/$MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput<br>($MMin^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 2.00 | 37.0% | 80.0% | 237,277 | 70.23 |
| Prisco 530 Fountain Soln | 0.07 | 6.8% | 100.0% | 237,277 | 0.57 |
| MRC-K Blanket Cleaner | 0.01 | 97.3% | 100.0% | 237,277 | 1.15 |
| **Total** | | | | | **71.95** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage<br>(lbs/$MMin^2$) | HAP Content (wt%) | Max. Throughput<br>($MMin^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.07 | 2.8% | 237,277 | 0.23 |
| MRC-K Blanket Cleaner | Cumene | 0.01 | 2.5% | 237,277 | 0.03 |
| | Xylene | 0.01 | 2.5% | 237,277 | 0.03 |
| **Total** | | | | | **0.29** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage (lbs/$MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Printing Press EU-15**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed (feet/min) | Maximum Print Width (Inches) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| EU-15: Harris M130 heatset web lithographic 37,319,040 $inches^2$ per hour | 1,364 | 38 | 326,915 |

**VOC Emissions**

| Product Name | Maximum Coverage ($lbs/MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 3.25 | 37.0% | 80.0% | 326,915 | 157.25 |
| Prisco 530 Fountain Soln | 0.06 | 6.9% | 100.0% | 326,915 | 0.68 |
| MRC-K Blanket Cleaner | 0.01 | 97.3% | 100.0% | 326,915 | 1.59 |
| **Total** | | | | | **159.51** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage ($lbs/MMin^2$) | HAP Content (wt%) | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.06 | 2.8% | 326,915 | 0.27 |
| MRC-K Blanket Cleaner | Cumene | 0.01 | 2.5% | 326,915 | 0.04 |
| | Xylene | 0.01 | 2.5% | 326,915 | 0.04 |
| **Total** | | | | | **0.35** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage ($lbs/MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Printing Press EU-16**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Speed<br>(feet/min) | Maximum Print Area<br>(Inches$^2$) | Maximum PTE<br>(MMin$^2$/Year) |
|---|---|---|---|
| EU-16: Harris M110<br>heatset 1/2 web lithographic | 860 | 18 | 97,635 |

**VOC Emissions**

| Product Name | Maximum Coverage<br>(lbs/MMin$^2$) | Weight % Volatiles | Flash Off % | Max. Throughput<br>(MMin$^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 2.00 | 37.0% | 80.0% | 97,635 | 28.90 |
| Prisco 530 Fountain Soln | 0.06 | 6.9% | 100.0% | 97,635 | 0.20 |
| MRC-K Blanket Cleaner | 0.02 | 97.3% | 100.0% | 97,635 | 0.95 |
| **Total** | | | | | **30.05** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage<br>(lbs/MMin$^2$) | HAP Content (wt%) | Max. Throughput<br>(MMin$^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.06 | 2.8% | 97,635 | 0.08 |
| MRC-K Blanket Cleaner | Cumene | 0.02 | 2.5% | 97635 | 0.02 |
| | Xylene | 0.02 | 2.5% | 97635 | 0.02 |
| **Total** | | | | | **0.13** |

Methodology

Maximum Throughput (MMin$^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area (inches$^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage (lbs/MMin$^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput (MMin$^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Printing Press EU-17**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed (feet/min) | Maximum Print Width (Inches) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| EU-17: Komori 4-color sheetfed offset lithographic | 661 | 40 | 166,762 |

**VOC Emissions**

| Product Name | Maximum Coverage ($lbs/MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 1.50 | 37.0% | 5.0% | 166,762 | 2.31 |
| Prisco 530 Fountain Soln | 0.04 | 6.9% | 100.0% | 166,762 | 0.23 |
| MRC-K Blanket Cleaner | 0.21 | 97.3% | 100.0% | 166,762 | 17.04 |
| **Total** | | | | | **19.58** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage ($lbs/MMin^2$) | HAP Content (wt%) | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.04 | 2.8% | 166,762 | 0.09 |
| MRC-K Blanket Cleaner | Cumene | 0.21 | 2.5% | 166,762 | 0.44 |
| | Xylene | 0.21 | 2.5% | 166,762 | 0.44 |
| **Total** | | | | | **0.97** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage ($lbs/MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Printing Press EU-18**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Line Speed (feet/min) | Maximum Print Width (Inches) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| EU-18: Komori 6-color sheetfed offset lithographic | 506 | 40 | 127,658 |

**VOC Emissions**

| Product Name | Maximum Coverage ($lbs/MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Heatset) | 1.50 | 37.0% | 5.0% | 127,658 | 1.77 |
| Prisco 530 Fountain Soln | 0.04 | 6.9% | 100.0% | 127,658 | 0.18 |
| MRC-K Blanket Cleaner | 0.21 | 97.3% | 100.0% | 127,658 | 13.04 |
| **Total** | | | | | **14.99** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage ($lbs/MMin^2$) | HAP Content (wt%) | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.04 | 2.8% | 127,658 | 0.07 |
| MRC-K Blanket Cleaner | Cumene | 0.21 | 2.5% | 127,658 | 0.34 |
| | Xylene | 0.21 | 2.5% | 127,658 | 0.34 |
| **Total** | | | | | **0.74** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage ($lbs/MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Kodak Direct Press**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Speed<br>(Sheet/Hour) | Maximum Print Area<br>(Inches$^2$) | Maximum PTE<br>(MMin$^2$/Year) |
|---|---|---|---|
| EU-D1: Kodak Direct Press<br>1,610,000 inches$^2$ per hour | 7,000 | 230<br>[Max. Length = 12.99", Max Width = 17.72"] | 14,104 |

**VOC Emissions**

| Product Name | Maximum Coverage<br>(lbs/MMin$^2$) | Weight % Volatiles | Flash Off % | Max. Throughput<br>(MMin$^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Flint Arrowstar Process Inks | 0.50 | 23.9% | 100.0% | 14,104 | 0.84 |
| Bottcherin PK-6 Blanket Wash | 0.10 | 97.3% | 100.0% | 14,104 | 0.69 |
| **Total** | | | | | **1.53** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage<br>(lbs/MMin$^2$) | HAP Content (wt%) | Max. Throughput<br>(MMin$^2$/Year) | Potential to Emit<br>(Tons/Year) |
|---|---|---|---|---|---|
| Bottcherin PK-6 Blanket Wash | Cumene | 0.10 | 1% | 14,104 | 0.01 |
| | Xylene | 0.10 | 1% | 14,104 | 0.01 |
| **Total** | | | | | **0.01** |

Methodology

Maximum Throughput (MMin$^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area (inches$^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage (lbs/MMin$^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput (MMin$^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Ryobi Printer**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Throughput<br>Press I.D. | Maximum Speed (Sheet/Hour) | Maximum Print Area ($Inches^2$) | Maximum PTE ($MMin^2$/Year) |
|---|---|---|---|
| Ryobi 3302<br>sheetfed lithographic<br>53,352 $inches^2$ per hour | 250 | 216<br>[Max Length = 18", Max Width = 12"] | 473 |

**VOC Emissions**

| Product Name | Maximum Coverage ($lbs/MMin^2$) | Weight % Volatiles | Flash Off % | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Braden Sutphin Inks (Various) | 2.50 | 19.8% | 5.0% | 473 | 0.01 |
| Prisco 530 Fountain Soln | 0.12 | 6.8% | 100.0% | 473 | 0.00 |
| Botterchin PK-6 Blanket Wash | 0.12 | 97.3% | 100.0% | 473 | 0.03 |
| **Total** | | | | | **0.03** |

**HAP Emissions**

| Product Name | HAP | Maximum Coverage ($lbs/MMin^2$) | HAP Content (wt%) | Max. Throughput ($MMin^2$/Year) | Potential to Emit (Tons/Year) |
|---|---|---|---|---|---|
| Prisco 530 Fountain Soln | Ethylene Glycol | 0.12 | 2.8% | 473 | 7.862E-04 |
| Bottcherin PK-6 Blanket Wash | Cumene | 0.12 | 1% | 473 | 2.84E-04 |
| | Xylene | 0.12 | 1% | 473 | 2.84E-04 |
| **Total** | | | | | **1.35E-03** |

Methodology

Maximum Throughput ($MMin^2$/Year) = Maximum Speed (Sheet/Hour) x Maximum Print Area ($inches^2$) x 8,760 hours per year / 1,000,000

[VOC/HAP] Potential to Emit (Tons/Year) = Maximum Coverage ($lbs/MMin^2$) x [Pollutant] Content (wt%) x [Flash Off] x Max. Throughput ($MMin^2$/Year) / 2,000 lbs per ton

Max. Coverage for inks is the typical value for the number of color units, and max. coverage for fountain solutions and press cleaners extrapolated from throughput and actual usage.

NOTE: Nonheatset Lithographic has an assumed flash off of 5%. Other types of Printers have a flash off of 100%

(Source - OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (9/93))

**Appendix A: Emissions Calculations**
**Natural Gas Combustion**
**MM BTU/HR <100**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| Units | Maximum Heat Input Capacity (MMBtu/hr) | Number of Units | Total Maximum Heat Input Capacity (MMBtu/hr) |
|---|---|---|---|
| DO-9 Drying Oven | 1.00 | 1 | 1.00 |
| DO-13 Drying Oven | 1.00 | 1 | 1.00 |
| DO-14 Drying Oven | 1.00 | 1 | 1.00 |
| DO-15 Drying Oven | 1.00 | 2 | 2.00 |
| DO-16 Drying Oven | 1.30 | 2 | 2.60 |
| OX-1 Oxidizer | 0.88 | 1 | 0.88 |
| Spectrum Oxidizer | 1.76 | 1 | 1.76 |
| Space Heaters | Varies | 10 | 1.38 |
| **TOTAL** | | | **11.62** |

| Heat Input Capacity MMBtu/hr | HHV mmBtu / mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 11.6 | 1000 | 101.8 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100<br>**see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.1 | 0.4 | 0.4 | 0.0 | 5.1 | 0.3 | 4.3 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See following page for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion**
**MM BTU/HR <100**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.069E-04 | 6.106E-05 | 3.817E-03 | 9.160E-02 | 1.730E-04 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 2.544E-05 | 5.598E-05 | 7.124E-05 | 1.934E-05 | 1.069E-04 |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion**
**MM BTU/HR <100**

**Company Name:** PCI Holdings, LLC
**Address City IN Zip:** 2457 East Washington Street, Indianapolis, IN 46201
**Permit No.:** F097-31137-00298
**Reviewer:** Sarah Street
**Date:** November 14, 2011

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 6,106 | 0.1 | 0.1 |
| Summed Potential Emissions in tons/yr | 6,107 | | |
| CO2e Total in tons/yr | 6,144 | | |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*
**Governor**

*Thomas W. Easterly*
**Commissioner**

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


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

TO: Tony Cirabisi
PCI Holidings
2457 E Washington St
Indianapolis, IN 46201-4155

DATE: December 7, 2011

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

SUBJECT: Final Decision
FESOP - Administrative Amendment
097 - 31137 - 00298

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:
Dick Hill, COO
Adam Estes Cornerstone Environmental, Health & Safety
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.

# Mail Code 61-53

| IDEM Staff | LPOGOST 12/7/2011<br>PCI Holdings, LLC 097 - 31137 - 00298 final) | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**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<br>Remarks |
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| 2 | | Dick Hill COO PCI Holdings, LLC 2457 E Washington St Indianapolis IN 46201-4155 *(RO CAATS)* | | | | | | | | | |
| 3 | | Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)* | | | | | | | | | |
| 4 | | Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 *(Affected Party)* | | | | | | | | | |
| 5 | | Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)* | | | | | | | | | |
| 6 | | Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)* | | | | | | | | | |
| 7 | | Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 *(Local Official)* | | | | | | | | | |
| 8 | | Adam Estes Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 *(Consultant)* | | | | | | | | | |
| 9 | | Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)* | | | | | | | | | |
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