



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 27, 2011

RE: Color Box, LLC – Richmond Division / 177-31239-00063

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 12/3/07



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Rebecca Davis Stephenson
Color-Box LLC - Richmond Division
623 South G Street
Richmond, IN 47374

December 28, 2011

Re: 177-31239-00063
Third Minor Revision to
M177-18637-00063

Dear Ms. Stephenson

Color-Box LLC was issued a Minor Source Operating Permit (MSOP) Renewal No. M177-18637-00063 on August 20, 2004 for a stationary lithographic printing source that prints shipping and display containers located at 1056 Industries Road, Richmond, IN 47434. On December 8, 2011, the Office of Air Quality (OAQ) received an application from the source requesting the replacement of printing press (Press #1) with a new offset lithographic printing press (New Press 1). Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

- General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
- This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deena Patton, of my staff, at 317-234-5400 or 1-800-451-6027, and ask for extension 4-5400.

Sincerely,


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC /DP

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



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Color-Box, LLC - Richmond Division
1056 Industries Road
Richmond, Indiana 47374

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

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

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

Operation Permit No.: MSOP 177-18637-00063	
Issued by/Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 20, 2004 Expiration Date: August 20, 2014

First Notice-Only Change No. 177-19793-00063, issued on November 22, 2004.
Second Notice-Only Change No. 177-21888-00063, issued on November 16, 2005.
First Minor Permit Revision No. 177-23533-00063, issued on October 5, 2006.
Second Minor Permit Revision No. 177-25316-00063, issued December 27, 2007.
Third Notice-Only Change No.: 177-27592-00063, issued on March 30, 2009.
Fourth Notice-Only Change No.: 177-29703-00063, issued on October 19, 2010

Third Minor Permit Revision No.: 177-31239-00063	
Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 27, 2011 Expiration Date: August 20, 2014

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary lithographic printing source that prints shipping and display containers.

Source Address:	1056 Industries Road, Richmond, Indiana 47374
General Source Phone Number:	(765) 966-7588
SIC Code:	2752 (Commercial Printing, Lithographic) and 2653 (Corrugated and Solid Fiber Boxes)
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

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

- (a) Two (2) non-heatset offset lithographic printing presses, identified as Presses 2 and 3, each with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, and coating up to 6,500 paper sheets per hour, each exhausting to one (1) stack respectively identified as V2 and V3. Presses 2 and 3 were installed in 1999.
- (b) One (1) non-heat set offset sheet-fed lithographic printing press, identified as Press 4, installed in 2006, with a maximum line speed of 545 feet per minute and a maximum printing width of 64 inches, and coating up to 13,500 paper sheets per hour, exhausting at one (1) stack, identified as V4.
- (c) One (1) non-heatset offset lithographic printing press, identified as New Press 1, approved for construction in 2011 with a maximum line speed of 979.00 feet per minute and a maximum print width of 63.96 inches, and coating up to 15,000 paper sheets per hour, exhausting to stack V1.
- (d) One (1) pneumatic starch conveyance system, installed in 2001, processing up to 3,500 pounds starch per hour, and connected to the following equipment:
 - (1) One (1) starch silo, identified as S-1, with a storage capacity of 65 tons of starch, using a baghouse for particulate matter control, exhausting to one (1) stack, identified as EP #1; and
 - (2) One (1) starch kitchen (mixer), identified as S-2, using a filter sock for particulate matter control, and exhausting to the indoors through one (1) stack, identified as EP #2.

- (e) One (1) pneumatic scrap paper conveyance system using one (1) air separator/air screen, identified as S-3, installed in 2001, processing up to 5,000 pounds scrap paper per hour, using a cartridge filter for particulate control, exhausting to the indoors through one (1) stack identified as EP #4, and connected to the following equipment:
 - (1) One (1) corrugator, identified as C-1;
 - (2) One (1) laminator, identified as L-1;
 - (3) One (1) shredder, identified as SH-1; and
 - (4) Three (3) die cutters, identified as DC-1, DC-2, and DC-3.
- (f) One (1) natural gas fired steam generator, identified as B-1, installed in 2001, with a maximum heat input capacity of 6.2 million (MM) British thermal units (Btu) per hour, and exhausting to one stack identified as EP #3.
- (g) One (1) above ground storage tank with a capacity of 6,000 gallons, installed in 2001, storing laminating glue.
- (h) One (1) above ground storage tank with a capacity of 6,000 gallons, installed in 2004, storing aqueous coating.
- (i) One (1) scrap paper baler, identified as BA-1.
- (j) One (1) in-line gluer, identified as G-1, with potential glue usage of fifty-five (55) tons per year.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M177-18637-00063, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M177-18637-00063 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

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

B.14 Source Modification Requirement

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) non-heatset offset lithographic printing presses, identified as Presses 2 and 3, each with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, and coating up to 6,500 paper sheets per hour, each exhausting to one (1) stack respectively identified as V2 and V3. Presses 2 and 3 were installed in 1999.
- (b) One (1) non-heat set offset sheet-fed lithographic printing press, identified as Press 4, installed in 2006, with a maximum line speed of 545 feet per minute and a maximum printing width of 64 inches, and coating up to 13,500 paper sheets per hour, exhausting at one (1) stack, identified as V4.
- (c) One (1) non-heat set offset lithographic printing press, identified as New Press 1, approved for construction in 2011, with a maximum line speed of 979.00 feet per minute and a maximum print width of 63.96 inches, and coating up to 15,000 paper sheets per hour, exhausting to stack V1.

(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

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

The Permittee shall comply with the following:

- (a) The total amount of volatile organic compounds (VOC) emitted at the non-heatset offset lithographic printing press (Press 4), shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) The VOC content of the ink/varnish shall not exceed 45.0% by weight; and
- (c) The VOC flash off for the ink/varnish shall not exceed 5.0%.
- (d) The VOC content of the aqueous coating shall not exceed 3.43% by weight.

Compliance with the above limits, combined with the potential to emit VOC from all other emission units at the source, shall limit source-wide VOC emissions to less than twenty-five (25) tons per twelve (12) consecutive month period and render the requirements of 326 IAC 8-1-6 not applicable and comply with 326 IAC 2-6.1-6(g)(5).

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

Any change or modification that would increase the potential to emit of VOC at each of Press 1, 2 and 3 to 25 tons per year or more shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.

D.1.3 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1-1][326 IAC 2-7]

- (a) The emissions of each single Hazardous Air Pollutant (HAP) from Presses 1 through 4 shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall make the source an area source and shall render the requirements of 40 CFR 63, Subpart OOOO and Subpart JJJJ, not applicable.
- (b) The combined Hazardous Air Pollutant (HAP) emissions from Presses 1 through 4 shall

be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall make the source an area source and shall render the requirements of 40 CFR 63, Subpart OOOO and Subpart JJJJ, not applicable.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 through D.1.3 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 or vendor the copies of the "as supplied" and/or "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.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records for each printing press in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits respectively established in Conditions D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each ink, coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. Records shall indicate which materials and solvents are used for the ink/varnish, aqueous coating, blank wash, fountain solution, meter roll cleaner, and alcohol/ plate cleaner.
 - (2) The total VOC and HAP usage for each month; and
 - (3) The total VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no 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 reporting required by this condition.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) pneumatic starch conveyance system, installed in 2001, processing up to 3,500 pounds starch per hour, and connected to the following equipment:
 - (1) One (1) starch silo, identified as S-1, with a storage capacity of 65 tons of starch, using a baghouse for particulate matter control, exhausting to one (1) stack, identified as EP #1; and
 - (2) One (1) starch kitchen (mixer), identified as S-2, using a filter sock for particulate matter control, and exhausting to the indoors through one (1) stack, identified as EP #2.
- (e) One (1) pneumatic scrap paper conveyance system using one (1) air separator/air screen, identified as S-3, installed in 2001, processing up to 5,000 pounds scrap paper per hour, using a cartridge filter for particulate control, exhausting to the indoors through one (1) stack identified as EP #4, and connected to the following equipment:
 - (1) One (1) corrugator, identified as C-1;
 - (2) One (1) laminator, identified as L-1;
 - (3) One (1) shredder, identified as SH-1; and
 - (4) Three (3) die cutters, identified as DC-1, DC-2, and DC-3.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the starch silo S-1 shall not exceed 5.96 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the starch kitchen S-2 shall not exceed 5.96 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from air separator/air screen S-3, connected to the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1, DC-2, and DC-3), shall not exceed 7.57 pounds per hour when operating at a process weight rate of 2.5 tons per hour.

The above pounds per hour limitations were each calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the corrugator (C-1)/laminator (L-1) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pneumatic starch and scrap paper conveyance systems and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Control

Pursuant to Minor Permit Revision No. 177-14208-00063, issued on May 10, 2001, and in order to comply with condition D.2.1, the Permittee shall comply as follows:

- (a) The baghouse for particulate control shall be in operation and control emissions from the starch silo (S-1) at all times that the starch silo is in operation.
- (b) The filter sock for particulate control shall be in operation and control emissions from the starch kitchen (S-2) at all times that the starch kitchen is in operation.
- (c) The air separator/air screen with cartridge filter (S-3) for particulate control shall be in operation and control emission from the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1, DC-2, and DC-3) at all times that these facilities are in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the pneumatic starch conveyance system transfer points and starch silo (S-1) stack exhaust (i.e., stack EP #4) shall be performed during normal daylight operations during the transfer of starch to the storage silo and during the removal of starch from the storage silo to an alternate storage area. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the starch silo (S-1), at least once per shift when the starch silo (S-1) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the total static pressure drop across the air separator/air screen filter (S-3) used in conjunction with the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1, DC-2, and DC-3), at least once per shift when the corrugator (C-1), laminator (L-1), shredder (SH-1) and the die cutters (DC-1, DC-2, and DC-3) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the filter is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure in paragraphs (a) and (b) shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse and Filter Inspections

An inspection shall be performed each calendar quarter of all bags controlling the starch silo (S-1), and the filters controlling the corrugator (C-1), laminator (L-1), shredder (SH-1) and die cutters (DC-1, DC-2, and DC-3) connected to the air separator/air screen (S-3), when venting to the atmosphere. A baghouse and filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags and filters shall be replaced.

D.2.8 Broken or Failed Bag and Filter Detection

- (a) For a single compartment baghouses and filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse and filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the starch silo (S-1) stack exhaust (i.e., stack EP #4) once per shift when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.
- (d) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of the result of the inspections required under Condition D.2.3.
- (e) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) natural gas fired steam generator, identified as B-1, installed in 2001, with a maximum heat input capacity of 6.2 million (MM) British thermal units (Btu) per hour, and exhausting to one stack identified as EP #3.

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from the natural gas fired steam generator, as an indirect heating facility installed after September 21, 1983, shall be limited to 0.6 pounds per MMBtu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Color-Box, LLC - Richmond Division
Source Address: 1056 Industries Road, Richmond, Indiana 47374
MSOP No.: M177-18637-00063

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Quality Compliance and Enforcement Branch

Quarterly Report

Source Name: Color-Box, LLC - Richmond Division
 Source Address: 1056 Industries Road, Richmond, Indiana 47374
 MSOP No.: M177-18637-00063
 Facility: Non-heatset offset lithographic printing press (Press 4)
 Parameter: Volatile Organic Compounds (VOC)
 Limits: (a) The total amount of volatile organic compounds (VOC) emitted at the non-heatset offset lithographic printing press (Press 4), shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 (b) The VOC content of the ink/varnish shall not exceed 45.0% by weight; and
 (c) The VOC flash off for the ink/varnish shall not exceed 5.0%.
 (d) The VOC content of the aqueous coating shall not exceed 3.43% by weight.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Color-Box, LLC - Richmond Division
Address:	1056 Industries Road
City:	Richmond
Phone #:	(765) 966-7588
MSOP #:	177-18637-00063

I hereby certify that Color-Box, LLC - Richmond Division is:

still in operation.

no longer in operation.

I hereby certify that Color-Box, LLC - Richmond Division is:

in compliance with the requirements of MSOP 177-18637-00063.

not in compliance with the requirements of MSOP 177-18637-00063.

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

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Permit Revision to a Minor
Source Operating Permit (MSOP)

Source Description and Location
--

Source Name:	Color-Box LLC - Richmond Division
Source Location:	1056 Industries Road, Richmond, IN 47374
County:	Wayne
SIC Code:	2653 (Corrugated and Solid Fiber Boxes), 2752 (Commercial Printing, Lithographic)
Operation Permit No.:	177-29703-00063
Operation Permit Issuance Date:	October 19, 2010
Minor Permit Revision No.:	177-31239-00063
Permit Reviewer:	Deena Patton

On December 8, 2011, the Office of Air Quality (OAQ) received an application from Color-Box LLC-Richmond Division related to a modification to an existing corrugated container/lithographic printing facility.

Existing Approvals

The source was issued MSOP Renewal No. 117-18637-00063 on August 8, 2004. The source has since received the following approvals:

- (a) Notice Only Change No. 177-19793-00063, issued on November 22, 2004;
- (b) Notice Only Change No. 177-21888-00063, issued on November 16, 2005;
- (c) Minor Permit Revision No. 177-23533-00063, issued on October 5, 2006;
- (d) Minor Permit Revision No. 177-25316-00063, issued on December 27, 2007;
- (e) Notice Only Change No. 177-27592-00063, issued on March 30, 2009;
- (f) Notice Only Change No. 177-27742-00063, issued on April 15, 2009; and
- (g) Notice Only Change No. 177-29703-00063, issued on October 19, 2010.

County Attainment Status

The source is located in Wayne County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Wayne County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Wayne County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, and NO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (M117-29703-00063) (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
B-1	0.21	0.21	0.21	0.02	2.72	0.15	2.28	-	--	--
C-1, L-1, L-2, SH-1, DC-1, DC-2	2.51	2.51	2.51	--	--	--	--	--	--	--
S-1	0.74	0.74	0.74	--	--	--	--	--	--	--
L-1	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
L-2	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
Press #1	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #2	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #3	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #4	--	--	--	--	--	31.8	--	--	4.31	2.57 (glycol ether)
G-1	--	--	--	--	--	0.61	--	--	0.32	0.27 (vinyl acetate)
Nat. Gas Combustion	0.1	0.2	0.2	0.0	2.7	0.1	2.3	3,279	.005	Negl.
Total PTE of Entire Source	3.56	3.66	3.66	0.02	5.42	96.09	4.58	3,279	21.30	6.62 (vinyl acetate)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Color-Box LLC-Richmond Division on December 8, 2011, requesting the replacement of printing press (Press #1) with a new offset lithographic printing press (New Press 1).

The following is a list of the new emission unit:

- (a) One (1) non-heatset offset lithographic printing press, identified as New Press 1, approved for construction in 2011, with a maximum line speed of 979.00 feet per minute and a maximum print width of 63.96 inches, and coating up to 15,000 paper sheets per hour, exhausting to stack V1.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

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

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Press #1 (being replaced)	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
New Press 1	--	--	--	-	-	14.9	-	-	0.11	Negl.
Total PTE of Proposed Revision	--	--	--	-	-	14.9	-	-	0.11	.005 (1,2,4-Trimethyl benzene)

Negl. = negligible
 Emission Units P-2 and P-10 have been removed from the facility.
 Parenthesis "()" denote a decrease in emissions due to the removal of the units.

This MSOP is being revised through a MSOP Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(4)(iii), because the revision involves the construction of an emission unit with potential to emit (PTE) VOCs within the ranges specified in 326 IAC 2-6.1-6(g)(4)(iii).

Therefore, this MSOP is being revised through MSOP Minor Permit revision pursuant to 326 IAC 2-6.1-6(g)(4)(iii).

PTE of the Entire Source After Issuance of the MSOP Revision

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
B-1	0.21	0.21	0.21	0.02	2.72	0.15	2.28	-	--	--
C-1, L-1, L-2, SH-1, DC-1, DC-2	2.51	2.51	2.51	--	--	--	--	--	--	--
S-1	0.74	0.74	0.74	--	--	--	--	--	--	--
L-1	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
L-2	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
Press #1	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
New Press 1						14.90			0.11	.005 (1,2,4- Trimethyl benzene)
Press #2	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #3	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #4	--	--	--	--	--	31.8	--	--	4.31	2.57 (glycol ether)
G-1	--	--	--	--	--	0.61	--	--	0.32	0.27 (vinyl acetate)
Nat. Gas Combustion	0.1	0.2	0.2	0.0	2.7	0.1	2.3	3,279	0.005	Negl.
Total PTE of Entire Source	3.56	3.66	3.66	0.02	5.42	96.09 95.68	4.58	3,279	21.30 19.33	6.62 (vinyl acetate)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
B-1	0.21	0.21	0.21	0.02	2.72	0.15	2.28	-	--	--
C-1, L-1, L-2, SH-1, DC-1, DC-2	2.51	2.51	2.51	--	--	--	--	--	--	--
S-1	0.74	0.74	0.74	--	--	--	--	--	--	--
L-1	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
L-2	--	--	--	--	--	8.75	--	--	5.21	3.31 (vinyl acetate)
New Press 1	--	--	--	--	--	14.90	--	--	0.11	0.005 (1,2,4- Trimethylb enzene)
Press #2	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #3	--	--	--	--	--	15.31	--	--	2.08	1.24 (glycol ether)
Press #4	--	--	--	--	--	31.8	--	--	4.31	2.57 (glycol ether)
G-1	--	--	--	--	--	0.61	--	--	0.32	0.27 (vinyl acetate)
Nat. Gas Combustion	0.1	0.2	0.2	0.0	2.7	0.1	2.3	3,279	0.005	Negl.
Total PTE of Entire Source	3.56	3.66	3.66	0.02	5.42	96.09	4.58	3,279	19.33	6.62 (vinyl acetate)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

MSOP Status

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing 40 CFR 60, Subpart QQ (326 IAC 12), are not included for this proposed revision, since the one (1) new non-heatset offset lithographic printing press (New Press 1) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ) as it is not a rotogravure printer.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the printing and publishing industry, 40 CFR 63.820, Subpart KK (326 IAC 20-18-1), are not included for this proposed revision, since New Press 1 is not a rotogravure press or a wide-web flexographic (WWF) printing press.
- (d) New Press 1 is not subject to the requirements of 40 CFR 63 Subpart JJJJ (National Emissions Standards for Hazardous Air Pollutants for Paper and Web Coating because it is not used for web coating, and is not a major source of HAPs as defined in 40 CFR 63.2.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute

averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

Non-heatset offset lithographic printing press (New Press 1)

- (g) 326 IAC 2-4.1-1 (New Source Toxics Control)
The operation of the New Press 1, which was constructed after the July 27, 1997 rule applicability date, will emit less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (i) 326 IAC 8-1-6 (New facilities; general reduction requirements)
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the new press (New Press 1) is less than twenty-five (25) tons per year.
- (j) 326 IAC 8-5-5 (Graphic Arts Operations)
The proposed revision is not subject to the requirements of 326 IAC 8-5-5, since New Press 1 is not a rotogravure or flexographic printing press.
- (k) There are no other 326 IAC 8 Rules that are applicable to the unit.
- (l) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary

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

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

devices:

(a) ~~Three Two~~ (32) non-heatset offset lithographic printing presses, identified as Presses 4, 2, and 3, each with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, and coating up to 6,500 paper sheets per hour, each exhausting to one (1) stack respectively identified as V4, V2 and V3. Presses 4, 2 and 3 were installed in 1999.

...
(c) **One (1) non-heatset offset lithographic printing press, identified as New Press 1, approved for construction in 2011 with a maximum line speed of 979.00 feet per minute and a maximum print width of 63.96 inches, and coating up to 15,000 paper sheets per hour, exhausting to stack V1.**

...
SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) ~~Three Two~~ (32) non-heatset offset lithographic printing presses, identified as Presses 4, 2, and 3, each with a maximum line speed of 262.5 feet per minute and a maximum print width of 65 inches, and coating up to 6,500 paper sheets per hour, each exhausting to one (1) stack respectively identified as V4, V2 and V3. Presses 4, 2 and 3 were installed in 1999.

(b) One (1) non-heat set offset sheet-fed lithographic printing press, identified as Press 4, installed in 2006, with a maximum line speed of 545 feet per minute and a maximum printing width of 64 inches, and coating up to 13,500 paper sheets per hour, exhausting at one (1) stack, identified as V4.

(c) **One (1) non-heat set offset lithographic printing press, identified as New Press 1, approved for construction in 2011, with a maximum line speed of 979.00 feet per minute and a maximum print width of 63.96 inches, and coating up to 15,000 paper sheets per hour, exhausting to stack V1.**

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 8, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Revision No. 177-31239-00063. The staff recommends to the Commissioner that this MSOP Minor Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Deena Patton at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317)234-5400 or toll free at 1-800-451-6027 extension 45400

(b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Total Emissions from the Source**

**Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-00063
Plt ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011**

Unrestricted PTE with Addition of High Speed Press (non-heatset offset lithographic)

	ID	PM	PM ₁₀	SO ₂	NO _x	CO	GHGs CO ₂ e	VOC PTE	Total HAPs
Steam Generator	B-1	0.21	0.21	0.02	2.72	2.28	3279.00	0.15	Neg.
Scrap System ⁽¹⁾	C-1, L-1, L-2, SH-1, DC-1, DC-2	2.51	2.51						
Starch Silo & Transfer ⁽¹⁾	S-1	0.74	0.74						
Laminator #1 ⁽²⁾	L-1							8.75	5.21
Laminator #2	L-2							8.75	5.21
Harris Press #1	Press #1							15.31	2.08
New Press #1	Press #1							14.90	0.11
Harris Press #2	Press #2							15.31	2.08
Harris Press #3	Press #3							15.31	2.08
In-line Gluer	G-1							0.61	0.32
Misc. Exempt (aerosols, etc.)								Neg.	Neg.
High Speed Press	Press #4							31.8	4.31
Total PTE		3.5	3.5	0.0	2.7	2.3	3279.0	95.6	19.3

Proposed Limits:

- VOC emissions limitation of less than 25 tons/yr on the new press. Facility will remain a minor source.

Appendix A: Process Particulate Emissions

Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-00063
Plt ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011

Potential to Emit (tons/year)						
Process Baghouse/Filter*	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total PM/PM10 (tons/yr)
EP-1	1	0.0400	4.7	64	99.9%	0.45
EP-2	1	0.0400	3.06	64	99.9%	0.29
EP-4	1	0.0020	1.99	16,800	99.9%	2.51
Total Potential to Emit Based on Rated Capacity at 8,760 Hours/Year						3.26

Methodology:

Baghouse (tons/yr) = No. Units * Outlet Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

* Note: Pursuant to Minor Permit Modification No. 177-14208, issued on May 10, 2001, control equipment is considered an integral part of the process since emission units are connected to controls that are part of a pneumatic conveyance system.

Baghouse EP-1 controls PM/PM10 emissions from the Starch Silo (S-1)

Baghouse EP-2 controls PM/PM10 from Starch Kitchen (S-2)

Cartridge filter EP-4 controls PM/PM10 emissions from Corrugator (C-1), Laminator (L-1), Shredder (SH-1), Die Cutter 1 (DC-1) and Die Cutter 2 (DC-2)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Color-Box LLC-Richmond Division

Source Address: 1056 Industries Road, Richmond IN 47374

Permit Number: 177-31239-00063

Plt ID: 177-00063

Reviewer: Deena Patton

Date: December 20, 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
6.2	1000	54.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.2	0.2	0.0	2.7	0.1	2.3

*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 page 2 for HAPs emissions calculations.

updated 7/11

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

Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-00063
Pit ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.703E-05	3.259E-05	2.037E-03	4.888E-02	9.233E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.358E-05	2.987E-05	3.802E-05	1.032E-05	5.703E-05

Methodology is the same as page 1.

Total HAPs= 5.125E-02

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.

updated 7/11

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Color-Box LLC-Richmond Division

Source Address: 1056 Industries Road, Richmond IN 47374

Permit Number: 177-31239-00063

Pit ID: 177-00063

Reviewer: Deena Patton

Date: December 20, 2011

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	3,259	0.1	0.1
Summed Potential Emissions in tons/yr	3,259		
CO2e Total in tons/yr	3,279		

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).

Appendix A: Emissions Calculations

VOC and HAP Emissions from the Corrugator/Laminator

Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-00063
Plt ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011

Revised Emissions from the Corrugator (C-1)/Laminator (L-1)

Maximum Line Speed 500 ft/min
 Maximum Product Width 64 inches

Glue Usage: 5.5 lbs/msf; 0.22% VOC & less than 0.09% HAPs
 Starch Usage: 6.5 lbs/msf; 0.006% VOCs & 0.006% HAPs from starch additive

500 ft/min x	64 inches /	12 inches/foot /	1000	=	2.67	msf/min
5.5 lbs/msf x	2.67 msf/min x	60 min/hr	=	881	lbs of glue/hr	
6.5 lbs of starch/msf x	2.67 msf/min x	60 min/hr	=	1041	lbs of starch mix/hr	

Maximum Potential VOC Emissions

881 lbs/hr of glue x	0.22% % VOCs	=	1.94 lbs/hr	8.48 tons/yr
1041 lbs/hr of starch x	0.0060% % VOCs	=	0.062 lbs/hr	0.27 tons/yr
				8.75 tons/yr

Maximum Potential HAP Emissions

881 lbs/hr of glue x	0.09% Vinyl Acetate	=	0.758 lbs/hr	3.32 tons/yr
881 lbs/hr of glue x	0.03% Methanol	=	0.220 lbs/hr	0.96 tons/yr
881 lbs/hr of glue x	0.017% Formaldehyde	=	0.150 lbs/hr	0.66 tons/yr
881 lbs/hr of glue x	0.2 (lb/mmlb) Acetaldehyde	=	1.76E-04 lbs/hr	7.72E-04 tons/yr
881 lbs/hr of glue x	0.1 (lb/mmlb) Ethylene Oxide	=	8.81E-05 lbs/hr	3.86E-04 tons/yr
881 lbs/hr of glue x	0.1 (lb/mmlb) 1,4 Dioxane	=	8.81E-05 lbs/hr	3.86E-04 tons/yr
881 lbs/hr of glue x	0.1 (lb/mmlb) Propylene Oxide	=	8.81E-05 lbs/hr	3.86E-04 tons/yr
1041 lbs/hr of starch x	0.00600% Formaldehyde	=	0.0625 lbs/hr	0.27 tons/yr
				5.21 tons/yr

Note:

Up to 40 oz. (0.3125 gal.) of aquaseal W -150 water resistant additive is mixed into every 30 gallons of starch mixture.
 The aquaseal contains < 0.5% formaldehyde and < 0.5% VOC content. The starch mixture VOC and HAP content is calculated as follows:
 (0.3125 gal. * 1.15 * 8.34 lb/gal * 0.5%) / (30 gal. * 8.34 lb/gal) = 0.006%

**Appendix A: Emissions Calculations
VOCs From Printing Press 1**

Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-0063
Plt ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011

Throughput	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin ² /YEAR
Press #1	979	63.96	394937

Ink VOCs	Material	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % ⁽¹⁾	Throughput (MMin ² /Year)	VOC Emissions (tons/yr)
	Ink	0.0180	29.50%	5%	394937	0.05
	Coating	0.0860	58.34%	100%	394937	9.91

Total VOC Emissions =	9.96	Ton/yr
Total VOC Emissions from all Chemicals=	14.90	Ton/yr

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

14.9

Methodology:

Throughput (Mmin²/year) = [Maximum Line Speed (feet/min)] * [12 inches/foot] * [Maximum Print Width (inches)] * [60 min/hr] * [8760 hrs/yr]
 VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin²)] * [Weight % Volatiles] * [Flash Off %] * [Throughput (Mmin²/year)] * [ton/2000 lbs]
 Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention).
 Other type of printers have a flash off of 100% (0% retention).

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

Miscellaneous Coating VOC Emissions

Material	Density (Lb/Gal)	Weight % Volatile & Organics (H2O)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Metering Roll Cleaner (ALKALESS 8000)	3.4	41.80%	0%	42%	0%	0.00%	0.02700	1.44	1.44	0.04	0.93	0.17	0.00	N/A	100%
Plate Cleaner (ANTURA CIP PLATE CLEANER)	0.4	20.00%	0%	20%	0%	0.00%	0.00960	0.08	0.08	0.00	0.02	0.00	0.00	N/A	100%
Fountain Solution (BOTTCHERIN PK6)	6.6	97.00%	0%	97%	0%	0.00%	0.16000	6.40	6.40	1.02	24.58	4.49	0.00	N/A	100%
Blanket Wash (FOUNTAIN CONCENTRATE 3451 U)	2.17	24.30%	0.0%	24.3%	0.0%	0.00%	0.1200	0.53	0.53	0.06	1.52	0.28	0.00	N/A	100%
Potential to Emit:										1.19	27.05	4.94	0.00		

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

HAP Emissions

Material	Density (Lb/Gal)	Maximum (Lb/hr)	Weight % Xylene	Weight % 2,4-Trimethylbenzer	Weight % Glycol ethers	Xylene Emissions (ton/yr)	1,2,4-Trimethylbenzene Emissions (ton/yr)	Glycol ethers Emissions (ton/yr)
Fountain Solution	0.75	0.16	1.00%	10.00%	0.00%	5.26E-03	5.26E-02	0.00E+00
Metering Roll Cleaner	0.41	0.0270	0.00%	0.00%	100.00%	0.00E+00	0.00E+00	4.85E-02
Potential to Emit:						5.26E-03	5.26E-02	4.85E-02
Combined Potential to Emit:								0.11

Note:

No specific HAP information provided for Misc. coatings. Assumed 100% Toluene

Methodology:

HAPS emission rate (tons/yr) = Density (lb/gal) * Maximum (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Color-Box LLC-Richmond Division
Source Address: 1056 Industries Road, Richmond IN 47374
Permit Number: 177-31239-00063
Plt ID: 177-00063
Reviewer: Deena Patton
Date: December 20, 2011

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MAXIMUM SHEET FEED (SHEETS/HR)
Presses 1, 2, 3 & 4 (each)*	262.5	65	6,500

* Each press is a non-heatset offset type of lithographic printing press.

Potential to Emit of VOC from Non-Heatset Offset Lithographic Printing Press Operations*

Material	Material Usage at Each of Presses 1, 2, 3 & 4**	VOC Content	Percentage Flash Off	Uncontrolled VOC PTE per Press (tons/yr)	Uncontrolled VOC PTE All Presses (tons/yr)
Ink	26.00 lbs/hr	40.00 % (wt)	5%	2.28	9.11
Aqueous Coating	42.25 lbs/hr	4.00 % (wt)	100%	7.40	29.61
Blanket Wash	93.0 gallon/month	6.71 lbs VOC/gal	100%	3.74	14.98
Fountain Solution	109.2 gallon/month	3.21 lbs VOC/gal	100%	2.10	8.41
Metering Roll Cleaner	12.6 gallon/month	4.93 lbs VOC/gal	100%	0.37	1.49
Alcohol	4.0 gallon/month	6.51 lbs VOC/gal	100%	0.16	0.62
Total (ton/yr):				16.06	64.22

Potential to Emit of HAPs from Non-Heatset Offset Lithographic Printing Press Operations*

Material	HAP	Material Usage at Each of Presses 1, 2, 3 & 4**	HAP Content	Percentage Flash Off	Uncontrolled HAP PTE per Press (tons/yr)	Uncontrolled HAP PTE All Presses (tons/yr)
Ink	none	26.00 lbs/hr	0.00%	5%	0.00	0.00
Aqueous Coating	glycol ether	42.25 lbs/hr	0.20 % (wt)	100%	0.37	1.48
Blanket Wash	xylene	93.0 gallon/month	0.1779 lbs HAP/gal	100%	0.10	0.40
	cumene		0.1403 lbs HAP/gal	100%	0.08	0.31
Fountain Solution	ethylene glycol	109.2 gallon/month	0.79 lbs HAP/gal	100%	0.52	2.07
	glycol ether		0.76 lbs HAP/gal	100%	0.50	1.99
Metering Roll Cleaner	methylene chloride	12.6 gallon/month	1.87 lbs HAP/gal	100%	0.14	0.57
Alcohol	none	4.0 gallon/month	0 lbs HAP/gal	100%	0.00	0.00
Total Combined HAPs(ton/yr):					1.70	6.82
Total Single HAP (glycol ether) (ton/yr):					0.87	3.47

METHODOLOGY

* Based on Significant Permit Revision No. 177-18522, issued on April 21, 2004 for Press 4. The same material usage rates applied at Press 4 are used herein for Presses 1, 2 and 3. The Permittee has requested as part of this review that the capacity of Presses 1, 2 and 3, each at 4,500 sheets per hour, be made the same as Press 4 at 6,500 sheets per hour. Assuming material usage to be linear, the potential to emit due to this increased capacity is 4.94 tons VOC per year (i.e., 16.06-(16.06*4500/6500)).

** Ink usage (lb/hr) reflects a maximum of 4 lb ink/1000 sheets, and the aqueous coating usage (lb/hr) reflects a maximum of 6.5 lbs aqueous coating/1000 sheets, per SPR No. 177-18522, issued on April 21, 2004. Information reflects the worst emitting ink.

VOC & HAP emissions = Material usage, lb/hr * % VOC or HAP by wt. * flash off (%) * 8760 hr/yr * ton/2000 lb
 = Material usage, gal/month * VOC or HAP content, lb/gal * flash off (%) * 12 month/yr * ton/2000 lb

NOTE: NON-HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 5% (95% RETAINED IN SUBSTRATE).
 (Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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www.idem.IN.gov

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

TO: Rebecca Stephenson
Color-Box, LLC - Richmond Division
623 S G Street
Richmond, IN 47374

DATE: December 27, 2011

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

SUBJECT: Final Decision
MSOP
177-31239-00063

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:
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 12/27/2011 Color-Box, LLC - Richmond Division 177-31239-00063 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Rebecca Stephenson Color-Box, LLC - Richmond Division 623 S G Street Richmond IN 47374 (Source CAATS)									
2		Theodore Samotis GM Color-Box, LLC - Richmond Division 623 S G Street Richmond IN 47374 (RO CAATS)									
3		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)									
4		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)									
5		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)									
6		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)									
7		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
9		Clifford Bowling, P.E. Georgia-Pacific, LLC PO Box 340 Brookneal VA 24528 (Source – addl contact)									
10											
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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