



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: May 14, 2013

RE: Discount Labels, Inc./043-33021-00029

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

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

Discount Labels, Inc.
4115 Profit Court,
New Albany, Indiana 47150

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

Registration No. 043-22958-00029	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 13, 2007

First Registration Revision No. 043-33021-00029	
Issued by:  Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 14, 2013

SECTION A

SOURCE SUMMARY

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

A.1 General Information

The Registrant owns and operates a stationary label printing and furniture coating plant.

Source Address:	4115 Profit Court, New Albany, Indiana 47150
General Source Phone Number:	812-981-4886
SIC Code:	2759
County Location:	Floyd
Source Location Status:	Nonattainment for PM _{2.5} Standard Attainment or unclassifiable for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

The following is a list of the existing emission units and pollution control device(s):

- (a) One (1) wide double web flexographic printing press, identified as 872, constructed in 1995, with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (b) Ten (10) Tripress flexographic printing presses, identified as 826, 827, 830, 836, 843, 846, 848, 861, 865 and 877, constructed between 1991 and 1997, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (c) Two (2) Mid Double Web flexographic printing presses, identified as 805, and 895, constructed in 1995, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (d) One (1) Double Die Tripress flexographic printing press, identified as 897, constructed in 1998, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (e) Fifteen (15) Webtron 450 flexographic printing presses, identified as 803, 828, 832, 833, 834, 838, 839, 840, 844, 864, 879, 880, 882, 883, and 890, constructed between 1991 and 1997, except for press 803, constructed in 1985, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of four (4) inches.
- (f) Twenty (20) Webtron 650 flexographic printing presses, identified as 804, 821, 837, 842, 847, 866, 873, 878, 884, 887, 889, 893, 899, 900C, 901, 902, 908, 910, and 912, constructed between 1991 and 2002, except press 887 constructed in 1988, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.
- (g) Four (4) Single Web flexographic printing presses, identified as 809, 816, 820, and 824, constructed between 1989 and 1991, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and one half (5.5) inches.
- (h) One (1) Barricade Banner flexographic printing press, identified as 808, constructed in 1985, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.

- (i) Two (2) Manhasset flexographic printing presses, 831 and 870, constructed in 1991 and 1995 respectively, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches.
- (j) One (1) Manhasset flexographic printing press, identified 885, constructed in 1996, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of thirteen (13) inches.
- (k) One (1) non-heatset offset (lithographic) printing press, identified as 708, constructed in 2005, with a maximum line speed of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches.
- (l) One (1) Wide Single Web flexographic printing press , identified as 906, constructed in 2000, with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.
- (m) Six (6) Webtron 650 flexographic printing presses, identified as 822, 903, 904, 905, 907, and 909, constructed in 1990 and 2003, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.
- (n) Two (2) digital printing presses, identified as HP#1 and HP#2, constructed in 2009, each with a maximum line speed of ninety (90) feet per minute and a printing width of twelve (12) inches.
- (o) One (1) digital printing press, identified as HP#3, constructed in 2011, with a maximum line speed of one hundred eighty (180) feet per minute and a printing width of twelve (12) inches.
- (p) Two (2) digital finishing presses, identified as HPF#1 and HPF#2, constructed in 2009, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches.
- (q) One (1) digital printing press, identified as 4830, constructed in 2011, with a maximum line speed of seventy five (75) feet per minute and a printing width of eight and a half (8.5) inches.
- (r) One (1) flexographic printing press, identified as Mark Andy, constructed in 2011, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of sixteen (16) inches.
- (s) One (1) sheet-fed UV topcoater, identified as TEC, constructed in 2011, with a minimum line speed of thirty (30) feet per minute and a printing width of twelve (12) inches.
- (t) One (1) ink mixing area, identified as IMA1, constructed in 2000, with a maximum ink production capacity of 124.52 pounds per day.
- (u) One (1) wood working area, identified as WW1, constructed in 1994 consisting of one (1) table saw, one (1) circular saw, one (1), one (1) planar, one (1) vertical rip saw, and one (1) band saw, each equipped with one (1) dust collector, identified as DC1, exhausting outside.
- (v) Two (2) parts washers, identified as PW1 and PW2, constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons per year
- (w) One (1) paint booth, identified as PB-1, constructed in 1996, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry particulate filter for over spray control.
- (x) Two (2) natural gas-fired water heaters with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (y) One metal machining area, identified as MM1, maximum metal processed 0.69 lb/hr, consisting of Metal Machining units where an aqueous cutting coolant continuously floods the machining interface.
- (z) One Welding Area, identified as WA1, consisting of the following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment.

SECTION B

GENERAL CONDITIONS

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

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

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

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of the fact that continuance of this registration is not consistent with purposes of this article.

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

- (a) All terms and conditions of permits established prior to Registration No. 043-33022-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

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

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

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

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

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

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.2 Fugitive Dust Emissions [326 IAC 6-4]

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

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (i) Two (2) parts washers (identified as PW1 and PW2), constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons per year.

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

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

D.1.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.

- (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

Company Name:	Discount Labels, Inc.
Address:	4115 Profit Court
City:	New Albany, Indiana 47150
Phone Number:	812-981-4886
Registration No.:	043-22958-00029

I hereby certify that Discount Labels, Inc. is :

still in operation.

I hereby certify that Discount Labels, Inc. is :

no longer in operation.

in compliance with the requirements of Registration No. 043-22958-00029.

not in compliance with the requirements of Registration No. 043-22958-00029.

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

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

Noncompliance:

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

Technical Support Document (TSD) for a Registration Revision

Source Description and Location

Source Name: Discount Labels, Inc.
Source Location: 4115 Profit Court, New Albany, Indiana 47150
County: Floyd
SIC Code: 2759
Registration No.: R043-22958-00029
Registration Issuance Date: July 13, 2007
Registration Revision No.: R043-33021-00029
Permit Reviewer: Swarna Prabha

On March 29, 2013, the Office of Air Quality (OAQ) received an application from Discount Labels, Inc., formerly known as Quality Park dba Discount Labels, Inc. requesting a modification to an existing registration and an official name change for the source.

Existing Approvals

The source was issued Registration No.: R043-22958-00029 on July 13, 2007. No other approvals have been issued to this source.

County Attainment Status

The source is located in Floyd County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Floyd County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Basic nonattainment designation effective federally 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. Floyd 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) **PM_{2.5}**
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Floyd County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These

rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants
 Floyd County has been classified as attainment or unclassifiable in Indiana for for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) 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 (tons/year)									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth , PB-1	0.31	0.31	0.31	-	-	1.76	-	-	0.31	0.22 Toluene
Printing Presses	-	-	-	-	-	3.23*	-	-	0.25*	0.19* Ethylene Glycol
Natural Gas-Fired Combustion Units	0.08	0.33	0.33	0.03	4.29	0.24	3.61	5184.4	.08	.077
Welding	negl.	negl.	negl.	-	-	-	-	-	negl.	negl.
Total	0.39	0.64	0.64	0.03	4.29	5.23	3.61	5184.4	0.64	0.22 (Toluene)
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 These emissions are based upon the registration NO. 043-22958-00029, issued on July 10, 2007.
 PM 10 = PM2.5
 * VOC and HAPs emissions based on 5% VOC flash off from Printing presses.
 **The 100,000 CO₂e 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 Discount Labels, Inc. on March 28, 2013, relating to the addition of: eight (8) printing presses, identified as HP#1, HP#2, HP#3, HPF#1, HPF#2, 4830, Mark Andy, and TEC; one (1) ink mixing process, identified as IMA1; one (1) wood working process consisting of five cutting units, identified as WW1; two (2) parts washers, identified as PW1 and PW2; and modification of the print width from five (5) inches to six (6) inches for Barricade Banner flexographic printing press, identified as 808. In addition, the source has requested to change the identification of all existing printing presses as listed in the table below. Furthermore, the source has requested to remove seven (7)

printing presses. The Permittee was issued a Registration No.: R043-22958-00029 on July 13, 2007. A retention factor of 95% has been accepted by the U.S. EPA for determining VOC emissions from non-heatset web inks printed on paper, which equates to a 5% release of VOC from this process. This retention factor was established as a result of ink oil retention studies conducted by the printing industry. The 95% retention factor was included in a document entitled Control Techniques Guideline for Offset Lithography, the PrintSTEP workbooks, the Potential to Emit (PTE) Guidance for Specific Source Categories memo and technical support document, and the Emission Inventory Improvement Program (EIIP) documents, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance Memo. The calculations for the potential emissions of VOC from these processes have been updated as part of this revision.

Unpermitted Emission Units and Pollution Control Equipment

The following is a list of the unpermitted emission units:

- (a) Two (2) digital printing presses, identified as HP#1 and HP#2, constructed in 2009, each with a maximum line speed of ninety (90) feet per minute and a printing width of twelve (12) inches.
- (b) One (1) digital printing press, identified as HP#3, constructed in 2011, with a maximum line speed of one hundred eighty (180) feet per minute and a printing width of twelve (12) inches.
- (c) Two (2) digital finishing presses, identified as HPF#1 and HPF#2, constructed in 2009, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches.
- (d) One (1) digital printing press, identified as 4830, constructed in 2011, with a maximum line speed of seventy five (75) feet per minute and a printing width of eight and a half (8.5) inches.
- (e) One (1) flexographic printing press, identified as Mark Andy, constructed in 2011, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of sixteen (16) inches.
- (f) One (1) sheet-fed UV topcoater, identified as TEC, constructed in 2011, with a minimum line speed of thirty (30) feet per minute and a printing width of twelve (12) inches.
- (g) One (1) ink mixing area, identified as IMA1, constructed in 2000, with a maximum ink production capacity of 124.52 pounds per day.
- (h) One (1) wood working area, identified as WW1, constructed in 1994, consisting of one (1) table saw, one (1) circular saw, one (1), one (1) planar, one (1) vertical rip saw, and one (1) band saw, each exhausting emissions to one (1) dust collector DC1.
- (i) Two (2) parts washers (identified as PW1 and PW2), constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons per year.

Emission Units and Pollution Control Equipment Removed and/or Changed Unit identification

Existing emission units previously identified as:	Revised emission units identified as:	Unit/s removed
(a) Two (2) Wide double web flexographic printing presses (identified as WDW1 and WDW-2)	One (1) Wide double web flexographic printing press (identified as Press 872)	One (1) Wide double web flexographic printing press (identified as WDW-2)
(c) Three (3) Mid Double Web flexographic printing presses (identified as MDW-1 through MDW-3), each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. These units were constructed in 1995.	Ten (10) Tripress flexographic printing presses, identified as Presses 826, 827, 830, 836, 843, 846, 848, 861, 865, and 877, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches. These units were constructed between 1991 and 1997.	

Existing emission units previously identified as:	Revised emission units identified as:	Unit/s removed
(d) One (1) Double Die Tripress flexographic printing press (identified as DDTRI-1) with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. This unit was constructed in 1998.	Two (2) Mid Double Web flexographic printing presses (identified as Presses 805 and 895), each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. These units were constructed in 1995.	One (1) Mid Double Web flexographic printing press (identified as MDW-3), each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. These units were constructed in 1995.
(e) One (1) Narrow Double Web flexographic printing press (identified as NDW-2) with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches. This unit was constructed in 1993.	One (1) Double Die Tripress flexographic printing press (identified as Press 897) with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. This unit was constructed in 1998	NA
(f) Fifteen (15) Webtron 450 flexographic printing presses (identified as 450-1 through 450-15), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of four (4) inches. These units were constructed between 1991 and 1997, except for press 450-8, which was constructed in 1985.	NA	Removed
(g) Twenty (20) Webtron 650 flexographic printing presses (identified as 650-1 through 650-20), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches. These units were constructed between 1991 and 2007, except for press 650-1, which was constructed in 1988.	Fifteen (15) Webtron 450 flexographic printing presses (identified as Presses 803, 828, 832, 833, 834, 838, 839, 840, 844, 864, 879, 880, 882, 883, and 890), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of four (4) inches. These units were constructed between 1991 and 1997, except for press 803, which was constructed in 1985.	NA
(h) Four (4) Single Web flexographic printing presses (identified as SW-1 through SW-4), each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and one half (5.5) inches. These units were constructed between 1989 and 1991.	Twenty (20) Webtron 650 flexographic printing presses (identified as 804, 821, 837, 842, 847, 866, 873, 874, 878, 884, 887, 889, 893, 899, 900C, 901C, 902, 908, 910, and 912), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches. These units were constructed between 1991 and 2007, except for press 887, which was constructed in 1988.	NA
(i) One (1) Barricade Banner flexographic printing press (identified as BB-1), with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of five (5) inches. This unit was	Four (4) Single Web flexographic printing presses (identified as Presses 809, 816, 820, and 824), each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and one half	NA

Existing emission units previously identified as:	Revised emission units identified as:	Unit/s removed
constructed in 1985.	(5.5) inches. These units were constructed between 1989 and 1991.	
(j) Two (2) Manhasset flexographic printing presses (identified as MAN-2 and MAN-3), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches. These units were constructed in 1991 and 1995.	(1) Barricade Banner flexographic printing press (identified as Press 808), with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six five (56) inches. This unit was constructed in 1988.	Modification
(k) One (1) Manhasset flexographic printing press (identified as MAN-4), with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of thirteen (13) inches. This unit was constructed in 1996.	Two (2) Manhasset flexographic printing presses (identified as Presses 831 and 870), each with a maximum line speed of one hundred and fifty (150) feet per minute and a print width of twelve (12) inches. These units were constructed in 1991 and 1995.	NA
(l) Three (3) non-heatset offset (lithographic) printing presses (identified as Heidelberg-1 through Heidelberg-3), each with a maximum line speed of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches	One (1) Manhasset flexographic printing press (identified as 885), with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of thirteen (13) inches. This unit was constructed in 1996.	NA
(m) One (1) Wide Single Web flexographic printing press (identified as WSW-1), with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches. This unit was constructed in 2000.	One (1) non-heatset offset (lithographic) printing (identified as Press 708), with a maximum line speed of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches. This unit was constructed in 2005.	(l) Two (2) non-heatset offset (lithographic) printing presses (identified as Heidelberg-2 through Heidelberg-3), each with a maximum line speed of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches.
(n) Eight (8) Webtron 650 flexographic printing presses (identified as 650-22 through 650-29), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.	One (1) Wide Single Web flexographic printing (identified as Press 906), with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches. This unit was constructed in 2000.	NA
	Six (6) Webtron 650 flexographic printing presses (identified as 822, 903, 904, 905, 907, and 909), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches. These units were constructed between 1990 and 2003.	(n) Two (2) Webtron 650 flexographic printing presses (identified as 650-28 through 650-29), each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.

The following is an updated list of the emission units at the source, with new identification and pollution control devices:

- (a) One (1) wide double web flexographic printing press, identified as 872, constructed in 1995, with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.

- (b) Ten (10) Tripress flexographic printing presses, identified as 826, 827, 830, 836, 843, 846, 848, 861, 865 and 877, constructed between 1991 and 1997, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (c) Two (2) Mid Double Web flexographic printing presses, identified as 805, and 895, constructed in 1995, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (d) One (1) Double Die Tripress flexographic printing press, identified as 897, constructed in 1998, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (e) Fifteen (15) Webtron 450 flexographic printing presses, identified as 803, 828, 832, 833, 834, 838, 839, 840, 844, 864, 879, 880, 882, 883, and 890, constructed between 1991 and 1997, except for press 803, constructed in 1985, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of four (4) inches.
- (f) Twenty (20) Webtron 650 flexographic printing presses, identified as 804, 821, 837, 842, 847, 866, 873, 878, 884, 887, 889, 893, 899, 900C, 901, 902, 908, 910, and 912, constructed between 1991 and 2002, except press 887 constructed in 1988, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.
- (g) Four (4) Single Web flexographic printing presses, identified as 809, 816, 820, and 824, constructed between 1989 and 1991, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and one half (5.5) inches.
- (h) One (1) Barricade Banner flexographic printing press, identified as 808, constructed in 1985, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of five (5) inches.
- (i) Two (2) Manhasset flexographic printing presses, 831 and 870, constructed in 1991 and 1995 respectively, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches.
- (j) One (1) Manhasset flexographic printing press, identified 885, constructed in 1996, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of thirteen (13) inches.
- (k) One (1) non-heatset offset (lithographic) printing press, identified as 708, constructed in 2005, with a maximum line speed of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches.
- (l) One (1) Wide Single Web flexographic printing press, identified as 906, constructed in 2000, with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.
- (m) Six (6) Webtron 650 flexographic printing presses, identified as 822, 903, 904, 905, 907, and 909, constructed in 1990 and 2003, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.
- (n) Two (2) digital printing presses, identified as HP#1 and HP#2, constructed in 2009, each with a maximum line speed of ninety (90) feet per minute and a printing width of twelve (12) inches.
- (o) One (1) digital printing press, identified as HP#3, constructed in 2011, with a maximum line speed of one hundred eighty (180) feet per minute and a printing width of twelve (12) inches.
- (p) Two (2) digital finishing presses, identified as HPF#1 and HPF#2, constructed in 2009, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches.
- (q) One (1) digital printing press, identified as 4830, constructed in 2011, with a maximum line speed of seventy five (75) feet per minute and a printing width of eight and a half (8.5) inches.

- (r) One (1) flexographic printing press, identified as Mark Andy, constructed in 2011, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of sixteen (16) inches.
- (s) One (1) sheet-fed UV topcoater, identified as TEC, constructed in 2011, with a minimum line speed of thirty (30) feet per minute and a printing width of twelve (12) inches.
- (t) One (1) ink mixing area, identified as IMA1, constructed in 2000, with a maximum ink production capacity of 124.52 pounds per day.
- (u) One (1) wood working area, identified as WW1, constructed in 1994 consisting of one (1) table saw, one (1) circular saw, one (1), one (1) planar, one (1) vertical rip saw, and one (1) band saw, each exhausting emissions to one (1) dust collector (identified as DC1).
- (v) Two (2) parts washers, identified as PW1 and PW2, constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons per year.
- (w) One (1) paint booth, identified as PB-1, constructed in 1996, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry particulate filter for over spray control.
- (x) Two (2) natural gas-fired water heaters with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (y) One metal machining area, identified as MM1, maximum metal processed 0.69 lb/hr, consisting of Metal Machining units where an aqueous cutting coolant continuously floods the machining interface.

NOTE: There are no emissions from this emission unit.

- (z) One Welding Area, identified as WA1, consisting of the following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgement was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operations were calculated after consideration of the controls for purposes of determining permit level and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) applicability, potential particulate matter emissions from the woodworking operations were calculated before consideration of the baghouse controls.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision.

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
Printing presses	-	-	-	-	-	5.56	-	-	5.56	5.44 Ethylene Glycol
Ink Mixing Area	-	-	-	-	-	0.04	-	-	-	-
Wood Cutting area (WW1)*	6.58	6.58	6.58	-	-	-	-	-	-	-
2 Parts Washer	-	-	-	-	-	0.16	-	-	negl.	negl.
Natural Gas-Fired Combustion Units	-	-	-	-	-	-	-	5,184	-	-
Welding area	0.01	0.01	0.01	-	-	-	-	-	negl.	negl.
Total PTE of Proposed Revision	6.59	6.59	6.59	-	-	5.76	-	5,184	5.56	5.44
negl. = negligible										
* PM emissions from wood working operations are without integral control.										

This Registration is being revised through a Registration Revision pursuant to 326 IAC 2-5.5-6(g), because the revision involves the construction of emission units with total potential to emit (PTE) VOC and HAPs greater than the thresholds in 326 IAC 2-1.1-3(e)(1) (Exemptions).

PTE of the Entire Source After Issuance of the Registration Revision

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth , PB-1	0.31	0.31	0.31	-	-	1.76	-	-	0.31	0.22 Toluene
Printing*** Presses	-	-	-	-	-	48.6 7.65	-	-	4.50 5.79	5.61 Ethylene Glycol
Natural Gas- Fired Combustion Units	0.08	0.33	0.33	0.03	4.29	0.24	3.61	5184.3	0.08	0.077 Hexane
Welding	negl. 0.01	negl. 0.01	negl. 0.01	-	-	-	-	-	negl.	negl.
Ink Mixing Area	-	-	-	-	-	0.04	-	-	-	-
Wood Cutting area (WW1)****	6.58	6.58	6.58	-	-	-	-	-	-	-
2 Parts Washers	-	-	-	-	-	0.16	-	-	negl.	negl.
Total PTE of Entire Source	6.98	7.23	7.23	0.03	4.29	10.76	3.61	5184.3	6.18	5.61
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 5 or < 10	< 25	< 100,000	< 25	< 10
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e 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.
 *** A retention factor of 95% has been accepted by the U.S. EPA for determining VOC emissions from non-heatset web inks printed on paper, which equates to a 5% release of VOC from this process. This retention factor was established as a result of ink oil retention studies conducted by the printing industry. The 95% retention factor was included in a document entitled Control Techniques Guideline for Offset Lithography, the PrintSTEP workbooks, the Potential to Emit (PTE) Guidance for Specific Source Categories memo and technical support document, and the Emission Inventory Improvement Program (EIIP) documents, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance Memo. The calculations for the potential emissions of VOC from these processes have been updated as part of this revision. Therefore, overall VOC emissions are reduced from printing presses.
 **** PM emissions from wood working are without integral control.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text unbolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth , PB-1	0.31	0.31	0.31	-	-	1.76	-	-	0.31	negl.
Printing Presses	-	-	-	-	-	7.65	-	-	5.79	5.61 Ethylene Glycol
Natural Gas-Fired Combustion Units	0.08	0.33	0.33	0.03	4.29	20.6	3.61	5184.3	0.08	0.077 Hexane
Welding	0.01	0.01	0.01	-	-	-	-	-	negl.	negl.
Ink Mixing Area	-	-	-	-	-	0.04	-	-	-	-
Wood Cutting area (WW1)	6.58	6.58	6.58	-	-	-	-	-	-	-
2 Parts Washers	-	-	-	-	-	0.16	-	-	negl.	negl.
Total PTE of Entire Source	6.98	7.23	7.23	0.03	4.29	10.76	3.61	5184.3	6.18	5.61
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e 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.

- (a) This revision will not change the registration status of the source, because the uncontrolled/ unlimited potential to emit of PM, PM₁₀, PM_{2.5}, CO, VOC NOx from the entire source will still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the PTE of all other regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This revision will not change the minor status of the source, because the uncontrolled/ unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) 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 (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

The federal rules applicable to the existing emission units at this source will not change as a result of this revision.

The federal rule applicability for this revision is as follows:

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in the permit, since the printing presses at this source are not rotogravure printing presses.
- (b) The requirements of the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (60.440 to 60.447) (326 IAC 12), are not included in this permit, because this source does not manufacture pressure sensitive tape and label materials.
- (c) The requirements of the New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing Source, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit, since this source does not have any rotogravure printing presses used to print or coat flexible vinyl or urethane products.
- (d) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (60.740 to 60.748) (326 IAC 12), are not included in this permit, because the source does not perform polymeric coating of supporting substrates, defined as web coating process that apply elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil (40 CFR 60.741).
- (e) There are no other 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)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit because the solvent utilized at this source does not contain any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) The requirements of 40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (NESHAP) (326 IAC 20-18) are not included in this permit because this source is not located at a major source of hazardous air pollutants (HAPs). This source has operated under the FESOP program since December 5, 1996, prior to transitioning to a registration in 2007, and has always had an unrestricted potential to emit HAPs that is less than major source levels.
- (c) The requirements of 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating (NESHAP) (326 IAC 20-65) are not included in this permit because this source is not located at a major source of hazardous air pollutants (HAPs). This source has operated under the FESOP program since December 5, 1996, prior to transitioning to a registration in 2007, and has always had an unrestricted potential to emit HAPs that is less than major source levels.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR Part 63, Subpart OOOO (326 IAC 20-77), are not included in the permit because the source does not print, coat, or dye fabric or other textiles as defined in 40 CFR 63.4371 and is not a major source of HAPs.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The state rules applicable to the existing emission units at this source will not change as a result of this revision.

326 IAC 2-5.5 (Registrations)

Registration applicability is discussed under the Permit Level Determination – Registration section above.

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 units 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.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this proposed revision is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

The proposed revision is not subject to the requirements of 326 IAC 6-5 because the source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, 326 IAC 6-5 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) do not apply to this source because this source did not commence its operation after October 7, 1974 and prior to January 1, 1980. This source was constructed after 1980.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Printing Presses

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) are not applicable to the printing presses, because these operations do not result in any particulate emissions.

326 IAC 8-2-5 (Paper Coating Operations)
The provisions of 326 IAC 8-2-5 (Paper Coating Operations) are not applicable to the printing presses at this source because these presses are not used for saturation processes of paper, plastic, metal foil, or pressure sensitive tapes and labels. They are used for printing labels and text on paper.

326 IAC 8-5-5 (Graphic Arts Operation)
Printing presses in the proposed revision are not subject to the provisions of 326 IAC 8-5-5 because these presses were constructed after November 1, 1980 and have potential emissions less than twenty five (25) tons per year.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)
Printing presses in the proposed revision constructed after January 1, 1980, are not subject to the provisions of 326 IAC 8-1-6 because each press has potential VOC emissions less than twenty-five (25) tons per year. (See TSD Appendix A)

State Rule Applicability – Woodworking Operation

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-1(b)(14) are not applicable to one (1) wood working area, identified as WW1, consisting of one (1) table saw, one (1) circular saw, one (1) planar, one (1) vertical rip saw, and one (1) band saw, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The proposed revision is not subject to the requirements of 326 IAC 8-2-12, because this source does not manufacture wood furniture and does not perform cabinet coating. Therefore, the requirements of 326 IAC 8-2-12 are not applicable.

State Rule Applicability – brazing, cutting, soldering

- 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
- (a) Pursuant to 326 IAC 6-3-1(b)(9) (Particulate Emission Limitations for Manufacturing Processes) the particulate matter (PM) from the welding operation is exempt because the welding operations use less than six hundred twenty-five (625) pounds of rod or wire is per day.
 - (b) Pursuant to 326 IAC 6-3-1(b)(10), the particulate matter (PM) from the torch cutting is exempt because torch cutting operation uses less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less.

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) One (1) ~~Two (2)~~ wide double web flexographic printing press, (identified as **872 WDW-1 and WDW-2**), **constructed in 1995**, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches. ~~These units were constructed in 1995.~~
- (b) Ten (10) Tripress flexographic printing presses, (identified as **826, 827, 830, 836, 843, 846, 848, 861, 865, and 877** Tri-1 through Tri-5, Tri-7, Tri-8, Tri-10 through Tri-12), **constructed between 1991 and 1997**, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches. ~~These units were constructed between 1994 and 1997.~~
- (c) **Two (2)** ~~Three (3)~~ Mid Double Web flexographic printing presses, (identified as **805 and 895** MDW-1 through MDW-3), **constructed in 1995**, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. ~~These units were constructed in 1995.~~
- (d) One (1) Double Die Tripress flexographic printing press (identified as **897 DDTRI-1**), **constructed in 1998**, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches. ~~This unit was constructed in 1998.~~
- (e) ~~One (1) Narrow Double Web flexographic printing press (identified as NDW-2) with a maximum line speed of seventy five (75) feet per minute and a printing width of five (5) inches. This unit was constructed in 1993.~~
- (ef) Fifteen (15) Webtron 450 flexographic printing presses, (identified as **803, 828, 832, 833, 834, 838, 839, 840, 844, 864, 879, 880, 882, 883, and 890** 450-1 through 450-15), **constructed between 1991 and 1997, except for press 803, which was constructed in 1985**, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of four (4) inches. ~~These units were constructed between 1994 and 1997, except for press 450-8, which was constructed in 1985.~~
- (fg) Twenty (20) Webtron 650 flexographic printing presses, (identified as **804, 821, 837, 842, 847, 866, 873, 874, 878, 884, 887, 889, 893, 899, 900, 901C, 902, 908, 910, and 912** 650-1 through 650-20), **constructed between 1991 and 2007, except for press 887 which was constructed in 1988**, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches. ~~These units were constructed between 1994 and 2002, except for press 650-1, which was constructed in 1988.~~
- (gH) Four (4) Single Web flexographic printing presses, (identified as **809, 816, 820, and 824** SW-1 through SW-4), **constructed between 1989 and 1991**, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and one half (5.5) inches. ~~These units were constructed between 1989 and 1991.~~
- (hi) One (1) Barricade Banner flexographic printing press, (identified as **808 BB-1**), **constructed in 1985**, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of **six (6)** ~~five (5)~~ inches. ~~This unit was constructed in 1985.~~
- (ij) Two (2) Manhasset flexographic printing presses, (identified as **831 and 870**, MAN-2 and MAN-3), **constructed in 1991 and 1995**, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of twelve (12) inches. ~~These units were constructed in 1994 and 1995.~~
- (jk) One (1) Manhasset flexographic printing press (identified as **885** MAN-4), **constructed in 1996**, with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of thirteen (13) inches. ~~This unit was constructed in 1996.~~
- (kl) **One (1)** ~~Three (3)~~ non-heatset offset (lithographic) printing presses, (identified as **708** Heidelberg-1 through Heidelberg-3), **constructed in 2005**, each with a maximum line speed

of one hundred ten (110) feet per minute and a printing area of ninety-three and one half (93.5) square inches.

- (lm) One (1) Wide Single Web flexographic printing press, (identified as ~~906 WSW-1~~), with a **constructed in 2000**, maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches. ~~This unit was constructed in 2000.~~
- (mn) ~~Six (6) Eight (8) Webtron 650 flexographic printing presses, (identified as 822, 903, 904, 905, 907, and 909 650-22 through 650-29),~~ **Six (6) Webtron 650 flexographic printing presses, (identified as 822, 903, 904, 905, 907, and 909 650-22 through 650-29), constructed between 1990 and 2003**, each with a maximum line speed of one hundred fifty (150) feet per minute and a printing width of six (6) inches.
- (n) **Two (2) digital printing presses, identified as HP#1 and HP#2, constructed in 2009, each with a maximum line speed of ninety (90) feet per minute and printing width of twelve (12) inches.**
- (o) **One (1) digital printing press, identified as HP#3, constructed in 2011, with a maximum line speed of one hundred eighty (180) feet per minute and printing width of twelve (12) inches.**
- (p) **Two (2) digital printing presses, identified as HPF#1 and HPF#2, constructed in 2009, each with a maximum line speed of seventy five (75) feet per minute and printing width of twelve (12) inches.**
- (q) **One (1) digital printing press, identified as 4830, constructed in 2011, with a maximum line speed of seventy five (75) feet per minute and printing width of eight and half (8.5) inches.**
- (r) **One (1) flexographic printing press, identified as Mark Andy, constructed in 2011, with a maximum line speed of one hundred fifty (150) feet per minute and printing width of eight and half (8.5) inches.**
- (s) **One (1) sheet-fed UV topcoater, identified as TEC, constructed in 2011, with a maximum line speed of thirty (30) feet per minute and printing width of of twelve (12) inches**
- (t) **One (1) ink mixing area, identified as IMA1, constructed in 2000, with a maximum production capacity of 124.52 pounds per day.**
- (u) **One (1) wood working area, identified as WW1, constructed in 1994, consisting of one (1) table saw, one (1) circular saw, one (1) planar, one (1) vertical rip saw, and one (1) band saw, equipped with one (1) dust collector, identified as DC1, exhausting outside.**
- (v) **Two (2) parts washers, identified as PW1 and PW2, constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons/yr.**
- (we) One (1) paint booth, (identified as PB-1), **constructed in 1996**, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry particulate filter for over spray control. ~~This unit was constructed in 1996.~~
- (xp) **Two (2) natural gas-fired water heaters and space heaters with heat input equal to or less than ten million (10,000,000) Btu per hour.**
- ~~(q) Machining where an aqueous cutting coolant continuously floods the machining interface.~~
- (y) **One (1) metal machining area, identified as MM1, equipped with metal machining units where an aqueous coolant continuously floods the machining.**

- (z) **One Welding Area, identified as WA1, consisting of the following** equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment.

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)]

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (i) **Two (2) parts washers (identified as PW1 and PW2), constructed in 1993 and 2003 respectively, with a combined maximum solvent usage rate of 48 gallons per year.**

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

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

D.1.1 Volatile Organic Compounds (Cold Cleaner Operations) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning degreaser operations constructed after January 1, 1980, the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.

- (D) Carbon adsorption.**
- (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
- (3) If used, solvent spray:**
 - (A) must be a solid, fluid stream; and**
 - (B) shall be applied at a pressure that does not cause excessive splashing.**

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 March 28, 2013

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed Registration Revision No.: 043-33021-00029. The staff recommends to the Commissioner that this Registration Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha 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) (234-5376) or toll free at 1-800-451-6027 extension (45376).
- (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

Company Name: Discount Labels, LLC
 Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
 Registration Revision No.: 043-33021-00029
 RegistrationNo.: 043-22958-00029
 Registration Issuance Date: 7/13/2007
 Reviewer: Swarna Prabha
 Date: May 14, 2013

Uncontrolled PTE

	Emission Points	PM PTE (tons/yr)	PM10 PTE (tons/yr)	PM2.5 PTE (tons/yr)	SO2 PTE (tons/yr)	Nox PTE (tons/yr)	VOC PTE (tons/yr)	CO PTE (tons/yr)	Single HAP (tons/yr)	Combined HAP (tons/yr)	GHG Emissions (tons/yr)
Existing Units	Printing Presses	-	-	-	-	-	3.23	-	0.19	0.25	-
	Pant Booth (PB1)	0.31	0.31	0.31	-	-	1.76	-	0.22	0.31	-
	Natural Gas Combustion	0.08	0.33	0.33	0.03	4.29	0.24	3.61	0.08	0.08	5184.30
	Metal Machining Area (MM1)	0.00	0.00	0.00	-	-	-	-	-	-	-
Total Existing units		0.39	0.64	0.64	0.03	4.29	5.23	3.61	0.22	0.64	5184.30
New Units	Eight (8) new Presses	-	-	-	-	-	5.56	-	5.44	5.56	-
	Ink Mixing Area	-	-	-	-	-	0.04	-	0.00	0.00	-
	2 Parts Washers	-	-	-	-	-	0.16	-	negl.	negl.	-
	Wood Cutting Area (WW1)	6.58	6.58	6.58	-	-	-	-	-	-	-
	Welding Area (WA1)	0.01	0.01	0.01	-	-	-	-	negl.	negl.	-
Removed units	Seven (7) presses	-	-	-	-	-	0.23	-	0.02	0.02	-
Increase in PTE		6.59	6.59	6.59	0.00	0.00	5.53	0.00	5.42	5.53	0
	Total	6.98	7.23	7.23	0.03	4.29	10.76	3.61	5.61	6.17	5184.30

**Appendix A: Emissions Calculations
Potential VOC Emissions From the Presses**

**Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
RegistrationNo.: 043-22958-00029
Reviewer: Swarna Prabha
Date: April 30, 2013**

Press ID	New/ Existing	# Presses	Max. Line Speed (ft/min)	Max. Print Width (in)	Max. Throughput (MMin ² /yr)
(a) One (1) Wide Double Web Flexographic Press	Existing	1	75	10	4730.40
(b) Ten (10) Tripress Flexographic Presses	Existing	10	75	6	28382.40
(c) Two (2) Mid Double Web Flexographic Presses	Existing	2	75	8	7568.64
(d) One (1) Double Die Tripress Flexographic Press	Existing	1	75	8	3784.32
(e) Fifteen (15) Webtron 450 Flexographic Presses	Existing	15	150	4	56764.80
(f) Twenty (20) Webtron 650 Flexographic Presses	Existing	20	150	6	113529.60
(g) Four(4) Single Web Flexographic Presses	Existing	4	75	5.5	10406.88
(h) One (1) Barricade Banner Flexographic Press	Existing	1	150	6	5676.48
(i) Two (2) Manhasset Flexographic Presses	Existing	2	150	12	22705.92
(j) One (1) Manhasset Flexographic Press	Existing	1	150	13	12299.04
(k) One (1) Non-heatset Offset Lithographic Press	Existing	1	110	93.5	5405.80
(l) One (1) Wide Single Web Flexographic Press	Existing	1	150	12	11352.96
(m) Six (6) Webtron 650 Flexographic Presses	Existing	6	150	6	34058.88
(n) Two (2) HP 4500 Digital Presses	New	2	90	12	13623.55
(o) One (1) HP 6000 Digital Press	New	1	180	12	13623.55
(p) Two (2) HP Finishers	New	2	150	12	22705.92
(q) One (1) Jetrion 4830	New	1	75	8.5	4020.84
(r) One (1) Printing Press Mark Andy	New	1	150	16	15137.28
(s) One (1) UV Topcoater	New	1	30	12	2270.59

NOTE: Following presses are removed and are not included in the above table

Removed Presses:

(a) One (1) Wide Double Web Flexographic Press	Removed	1	75	10	4730.40
(c) One (1) Mid Double Web Flexographic Press	Removed	1	75	8	3784.32
(e) One (1) Narrow Double Web flexographic press	Removed	1	75	5.00	2,365
(l) Two (2) Non-heatset Offset Lithographic Presses	Removed	2	110	93.5	10811.59
(n) Six (2) Webtron 650 Flexographic Presses	Removed	2	150	6	11352.96
		7			

PTE VOC removed

Press ID	Material	Max. Coverage (lb/MMin ²)	Weight Fraction VOC	Fraction Flashoff* **	PTE VOC (tons/yr)
(a)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.02
(c)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.02
(e)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.01
(l)	Ink	0.68	0.147	5%	0.00
	Additive	0.02	0.523	100%	0.06
(n)	Ink	0.68	0.147	5%	0.03
	Additive	0.02	0.523	100%	0.06
Total VOC removed					0.23

PTE HAPs removed

Press ID	Material	Max. Coverage (lb/MMin ²)	Weight Fraction HAPs	Fraction Flashoff* **	PTE HAP (tons/yr)
(a)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(c)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(e)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(l)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
(n)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
Total HAPs removed					0.02

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Press ID	Material	Max. Coverage (lb/MMin2)	Weight Fraction VOC	Fraction Flashoff* **	PTE VOC (tons/yr)
(a)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.02
(b)	Ink	0.68	0.147	5%	0.07
	Additive	0.02	0.523	100%	0.15
(c)	Ink	0.68	0.147	5%	0.02
	Additive	0.02	0.523	100%	0.04
(d)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.02
(e)	Ink	0.68	0.147	5%	0.14
	Additive	0.02	0.523	100%	0.30
(f)	Ink	0.68	0.147	5%	0.28
	Additive	0.02	0.523	100%	0.59
(g)	Ink	0.68	0.147	5%	0.03
	Additive	0.02	0.523	100%	0.05
(h)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.03
(i)	Ink	0.68	0.147	5%	0.06
	Additive	0.02	0.523	100%	0.12
(j)	Ink	0.68	0.147	5%	0.03
	Additive	0.68	0.147	100%	0.61
(k)	Ink	0.68	0.147	5%	0.01
	Additive	0.02	0.523	100%	0.03
(l)	Ink	0.68	0.147	5%	0.03
	Additive	0.02	0.523	100%	0.06
(m)	Ink	0.68	0.147	5%	0.09
	Additive	0.02	0.523	100%	0.18
Total Existing Presses					3.00
(n)	New Ink	0.35	0.90	5%	0.11
	Image Agent	0.004	0.90	100%	0.02
	Image Oil	0.58	1	100%	3.95
(o)	New Ink	0.44	0.90	5%	0.13
	Image Oil	0.18	1.00	100%	1.23
	Image Agent	0.01	0.80	100%	0.05
	Recycle Agent	0.01	0.80	100%	0.05
(p)	New Varnish	0.008	0.054	5%	0.00
(q)	New Ink	0.26	0.00	5%	0.00
	Flush	0.02	0.12	100%	0.00
(r)	New Digiprime	0.22	0.001	5%	0.00
(s)	New UV Coat	0.02	0.00	5%	0.00
	UV Wash	0.002	0.15	100%	0.00
Total New presses					5.56

Methodology:

Max. Throughput (MMin²/yr) = # presses * Max line speed (ft/min) * 12 in/ft * max width (in) * 60 min/hr * 8760 hr/yr * 1MMin²/1E6 in²

Max Throughput for "(l)" (MMin²/yr) = # presses * sheets/min * in²/sheet * 60 min/hr * 8760 hr/yr * 1 MMin²/1E6 in²

PTE VOC (tons/yr) = Max Coverage (lb/MMin²) * wt frac VOC * frac flash off * Max Throughput (MMin²/yr) * 1 ton/2000 lb

*0.05 flashoff factor reflects 95% ink oil retention as documented in the draft CTG document Control of Volatile Organic Compound Emissions From Offset Lithographic Printing, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance memo, Documentation of Emission Calculations. Tim Smith, USEPA/QAQPS, April 1998, pages 28-31

**1.00 flashoff factor reflects 100% flashoff for all additives as documented in the draft CTG document Control of Volatile Organic Compound Emissions From Offset Lithographic Printing, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance memo, Documentation of Emission Calculations. Tim Smith, USEPA/QAQPS, April 1998, pages 28-31 (copy enclosed)

**Appendix A: Emissions Calculations
Potential VOC and HAP Emissions From the Presses**

Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
Reviewer: Swarna Prabha
Date: May 14, 2013

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Potential HAP Emissions:

Press ID	New/ Existing	# Presses	Max.Line Speed (ft/min)	Max. Print Width (in)	Max. Throughput (MMin ² /yr)
(a) One (1) Wide Double Web Flexographic Press-872	Existing	1	75	10	4730.40
(b) Ten (10) Tripress Flexographic Presses	Existing	10	75	6	28382.40
(c) Two (2) Mid Double Web Flexographic Presses	Existing	2	75	8	7568.64
(d) One (1) Double Die Tripress Flexographic Press	Existing	1	75	8	3784.32
(e) Fifteen (15) Webtron 450 Flexographic Presses	Existing	15	150	4	56764.80
(f) Twenty (20) Webtron 650 Flexographic Presses	Existing	20	150	6	113529.60
(g) Four(4) Single Web Flexographic Presses	Existing	4	75	5.5	10406.88
(h) One (1) Barricade Banner Flexographic Press	Existing	1	150	6	5676.48
(i) Two (2) Manhasset Flexographic Presses	Existing	2	150	12	22705.92
(j) One (1) Manhasset Flexographic Press	Existing	1	150	13	12299.04
(k) One (1) Non-heatset Offset Lithographic Press	Existing	1	110	10	6937.92
(l) One (1) Wide Single Web Flexographic Press	Existing	1	150	12	11352.96
(m) Six (6) Webtron 650 Flexographic Presses	Existing	6	150	6	34058.88
(n) Two (2) HP 4500 Digital Presses	New	2	90	12	13623.55
(o) One (1) HP 6000 Digital Press	New	1	180	12	13623.55
(p) Two (2) HP Finishers	New	2	150	12	22705.92
(q) One (1) Jetrion 4830	New	1	75	8.5	4020.84
(r) One (1) Printing Press Mark Andy	New	1	150	16	15137.28
(s) One (1) UV Topcoater	New	1	30	12	2270.59

**Appendix A: Emissions Calculations
Potential VOC and HAP Emissions From the Presses**

**Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration NO.: 043-33021-00029
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: May 14, 2013**

Press ID	Material	Max. Coverage (lb/MMin2)	Weight Fraction HAPs	Fraction Flashoff* **	PTE HAP (tons/yr)
(a)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(b)	Hydroquinone	0.031	0.25	5%	0.01
	Ethylene Glycol	0.007	0.16	100%	0.02
(c)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(d)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(e)	Hydroquinone	0.031	0.25	5%	0.01
	Ethylene Glycol	0.007	0.16	100%	0.03
(f)	Hydroquinone	0.031	0.25	5%	0.02
	Ethylene Glycol	0.007	0.16	100%	0.06
(g)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
(h)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(i)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
(j)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
(k)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.00
(l)	Hydroquinone	0.031	0.25	5%	0.00
	Ethylene Glycol	0.007	0.16	100%	0.01
(m)	Hydroquinone	0.031	0.25	5%	0.01
	Ethylene Glycol	0.007	0.16	100%	0.02
Existing Presses Total	Hydroquinone				0.06
	Ethylene Glycol				0.18
(q)	New Ink	0.35	0.90	5%	0.11
	Image Agent	0.004	0.90	100%	0.02
	Image Oil	0.58	1.00	100%	3.95
(r)	New Ink	0.44	0.90	5%	0.13
	Image Oil	0.18	1.00	100%	1.23
	Image Agent	0.01	0.80	100%	0.05
	Recycle Agent	0.01	0.80	100%	0.05
(s)	New Varnish	0.008	0.054	5%	0.00
(t)	New Ink	0.26	0.00	5%	0.00
	Flush	0.02	0.12	100%	0.00
(u)	New Digiprime	0.22	0.001	5%	0.00
(v)	New UV Coat	0.02	0.00	5%	0.00
	UV Wash	0.002	0.15	100%	0.00
Total Combination HAPs From New Presses					5.56
Total Combination HAPs From all Presses					5.79
Single HAP					4.12

Methodology:

The potential HAPs for the existing units are 0.06 tpy hydroquinone and 0.18 tpy ethylene glycol. Since the individual materials used to make up the new inks and additives are listed in the MSDS as proprietary (not given) the HAP estimates for the new inks and additives is assumed to be the worst case existing HAP ethylene glycol which give a total worst case individual HAP estimate (existing ethylene glycol 0.18 tpy + new unit ethylene glycol 5.56 tpy) or 5.74 tons per year

The worst case Total HAP (tons/yr) = Ethylene Glycol (5.74 tons/yr) + Hydroquinone (0.06 tons/yr) = 5.80 tons/yr

Max. Throughput (MMin²/yr) = # presses * Max line speed (ft/min) * 12 in/ft * max width (in) * 60 min/hr * 8760 hr/yr * 1MMin²/1E6 in²

Max Throughput for "(l)" (MMin²/yr) = # presses * sheets/min * in²/sheet * 60 min/hr * 8760 hr/yr * 1 MMin²/1E6 in²

Pot. HAP (tons/yr) = Max Coverage (lb/MMin²) * wt frac VOC * frac flash off * Max Throughput (MMin²/yr) * 1 ton/2000 lb

*5% flashoff factor reflects 95% ink oil retention as documented in the draft CTG document Control of Volatile Organic Compound Emissions From Offset Lithographic Printing, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance memo, Documentation of Emission Calculations. Tim Smith, USEPA/QAQPS, April 1998, pages 28-31 (copy enclosed)

**100% flashoff factor reflects 100% flashoff for all additives as documented in the draft CTG document Control of Volatile Organic Compound Emissions From Offset Lithographic Printing, EPA-453/D-95-001, page 5-2; as found in "Technical Support Document for Potential to Emit Guidance memo, Documentation of Emission Calculations. Tim Smith, USEPA/QAQPS, April 1998, pages 28-31

Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
Registration Issuance Date: 7/13/2007
RegistrationNo.: 043-22958-00029
Reviewer: Swarna Prabha
Date: April 30, 2013

Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % VOC	Volume % Water	Pounds VOC Per Gallon of Coating Less Water	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	Weight % Solids	Transfer Efficiency (%)	PTE of PM/PM10 (tons/year)
Laquer	7.05	0.20	0.14	81.7%	0%	5.76	0.16	0.71	13%	55%	0.05
Moisture Resistant Laquer	7.40	0.15	0.14	75.5%	0%	5.59	0.12	0.51	85%	55%	0.26
K120 Laquer	6.58	0.20	0.14	82%	18%	4.42	0.12	0.54	0.0%	55%	0.00

Total (tons/year) = 1.76 0.31

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % VOC * 1/(1- Volume % Water)
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon of Coating less Water * Max. Usage Rate (gal/unit) * Max. Throughput Rate (units/hour)
PTE of VOC (tons/year) = PTE of VOC (lbs/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Density (lb/gal) * Max.Usage Rate (gal/unit) * Max.Throughput Rate (unit/hour) * Weight % Solids * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Paint Booth 1 (PB1) Individual HAP, and Combined HAP Emissions:

Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (Units/hr)	Weight % Toluene	Weight Fraction Xylene	PTE Toluene Emissions (tons/yr)	PTE Xylene Emissions (tons/yr)
Lacquer	7.05	0.2	0.14	11%	8%	0.10	0.07
Moist. Resist Lacquer	7.4	0.15	0.14	3%	3%	0.02	0.02
K120 Lacquer	6.58	0.2	0.14	13%	0%	0.10	0.00
Total						0.22	0.09

Combined Total HAP (tons/yr)	0.31
Total VOC (tons/yr)	0.31

Methodology (HAPs):

PTE Toluene HAP (lb/hr) = Density (lb/gal) * Usage (gal/unit) * Throughput (unit/hr) * wt.% HAP
PTE Toluene HAP (tons/yr) = Potential Toluene HAP (lb/hr) * 8760 hr/yr * 1 ton/2000 lb
PTE Xylene HAP (lb/hr) = Density (lb/gal) * Usage (gal/unit) * Throughput (unit/hr) * wt.% HAP
Potential Xylene HAP (tons/yr) = Potential Xylene HAP (lb/hr) * 8760 hr/yr * 1 ton/2000 lb
Total PTE Individual HAP (tons/yr) = sum (Lacquer (tons/yr) + Moist Resist lac. (tons/yr) + K120 (tons/yr))
Total Combined HAP (tons/yr) = Total Pot. Toluene (tons/yr) + Total Pot. Xylene (tons/yr)

Wood working area WW1

Company Name: Discount Labels, LLC
 Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
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 Reviewer: Swarna Prabha
 Date: April 30, 2013

Particulate Emissions Before Control (tons/year)			
Emission Unit	PM/PM10 Collection Rate (lb/hr)	PM/PM10 emissions (tons/yr)	Control Efficiency
Wood Cutting area WW1	1.50	6.577	99.90%
Total =		6.58	

Particulate Emissions After Control (tons/year)		
Emission Unit	PM/PM10 Collection Rate (lb/hr)	PM/PM10 emissions (tons/yr)
Wood Cutting area WW1	0.015	0.007
Total =		0.007

NOTE: The source make shelves to provide space for the final product and wood working area operates only 80 hrs/month.

Methodology:

Uncontrolled Emissions:

Uncontrolled Emissions (tons/yr) = Particulate Emission Rate (lb/hr) * 8760 hr/yr * 1 ton/2,000 lbs * 1/Control Efficiency

Uncontrolled emission rate based on particulate collected by the baghouses.

Controlled Emissions :

Controlled Emissions (lb/hr) = PM/PM10 Collection Rate (lb/hr) * 1/ Control Efficiency * (1-Control Efficiency)

Controlled emission rate based on particulate emitted after the dust collector.

Controlled Emissions (tons/yr) = Uncontrolled Particulate Emission Rate (tons/yr) * (1-Control Efficiency)

all material collected is PM. PM₁₀ and PM_{2.5} are assumed to be equal to PM.

Appendix A: Emissions Calculations
Ink Mixing Area VOC Emissions

Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
RegistrationNo.: 043-22958-00029
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: April 30, 2013

Material	Max. Usage (lb/yr)	Fraction VOC	Fraction HAP	Fraction Lost	VOC tons/yr	HAP (tons/yr)
Inks	35634.1	0.08	0.00	0.02	0.03	0.00
Extender	9816.03	0.08	0.00	0.02	0.01	0.00
Total					0.04	0.00

Methodology:

Total sum of all annual ink usage were combined.

Worst Case Ink VOC fraction assumed (0.08).

The inks contain no HAPs.

Per AP-42, Chapter 6.4 Paint and varnish, 6.4.1, 2% of VOC lost to the atmosphere during mixing.

Tons VOC/yr = max usage (lb/yr) * fraction VOC * 1 ton/2000lb * 0.02

**Appendix A: Emissions Calculations
Parts Washers VOC Emissions**

**Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
RegistrationNo.: 043-22958-00029
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: April 30, 2013**

Material	Density (lb/gal)	Maximum Usage (gal/yr)	Fraction VOC	VOC (tons/yr)	HAP (tons/yr)
Petroleum Distillates (Naphtha)	6.7	48	1.00	0.16	0.00

Methodology:

VOC (tons/yr) = density lb/gal * max. usage gal/yr * fraction VOC * 1 ton/2000 lb

**Appendix A: Emissions Calculations
Natural Gas Combustion, Water Heaters and Space Heaters**

Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
RegistrationNo.: 043-22958-00029
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: April 30, 2013

The combined capacity of the space heaters and water heaters is 10.00 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Hours of Operation
10.00	85.9	8760

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.29	0.24	3.61

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.02E-05	5.15E-05	3.22E-03	7.73E-02	1.46E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.15E-05	4.72E-05	6.01E-05	1.63E-05	9.02E-05	0.08

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x hrs/yr x 1 MMCF/1,020 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Company Name: Discount Labels, LLC
Address City IN Zip: 2371 N. Rainbow Drive, Warsaw, Indiana 46582
Registration No.: 085-33022-00129
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: April 30, 2013

Greenhouse Gas Emissions From the Natural Gas Equipment:

Emission Factor in lb/MMcf	Greenhouse gases			Total
	Methane	N ₂ O	CO ₂	
	2.3	2.2	120000.00	
Potential Emissions (tons/yr)	0.10	0.09	5152.94	
CO _{2e} Factor	21	310	1	
CO _{2e} (tons/yr)	2.07	29.29	5152.94	5184.30

Methodology:

Emissions (tons/yr) = MMcf/yr * Ef (lb/MMcf) * 1 ton/2000 lb

CO_{2e} (tons/yr) = (CO_{2e} factor) * Emissions (tons/yr)

The N₂O Emission Factor for uncontrolled is 2.2 lb/MMcf. The N₂O Emission Factor for low Nox burner is 0.64 lb/MMcf.

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

CO_{2e} (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
Welding and Thermal Cutting**

**Company Name: Discount Labels, LLC
Address City IN Zip: 4115 Profit Ct, New Albany, IN 47150
Registration Revision No.: 043-33021-00029
RegistrationNo.: 043-22958-00029
Registration Issuance Date: 7/13/2007
Reviewer: Swarna Prabha
Date: April 30, 2013**

PROCESS WELDING	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
Sub. Arc			0.036	0.011			0.000	0.000	0.000	0.00	0.000	
MIG	2	0.007	0.0055	0.0005			0.000	0.000	0.000	0.00	0.000	
Stick	1	0.007	0.0211	0.0009			0.000	0.000	0.000	0.00	0.000	
TIG	1	0.001	0.0055	0.0005			0.000	0.000	0.000	0.00	0.000	
Oxyacetal.			0.0055	0.0005			0.000	0.000	0.000	0.00	0.000	
FLAME Cutting	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetal.				0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymeth.				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.00		0.00		
Potential Emissions lbs/day								0.01		0.00		
Potential Emissions tons/year								0.01		0.00		

METHODOLOGY:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the EF for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

		ESP	Coolant Used	Combined Throughput lb/hr	Fraction PM Lost	PM, PM10, PM2.5 Emissions (tons/yr)
MM1	Incoming Parts	-	Aqueous	0.69	0.001	0.00

Methodology:

PM Emissions (tons/yr) = Combined Throughput (lb/hr) * Fraction PM Lost * 8760 hr/yr * 1 ton/2000 lb
 The Fraction lost is obtained from emission calculations used to determine metal machining particulate emissions associated with a registration revision issued to Mitsubishi Heavy Industries Climate Control, Inc., 081-29555-00043, issued September 23, 2010.

PM_{2.5} and PM₁₀ are assumed to be equal to PM.

An aqueous lubricant is used to minimize friction and heat when machining the metal. This lubricant also controls and particulate emissions that are generated. However, Discout Labels is not claiming any controlled emissions.

The maximum amount of metal processed is 0.69 lb/hr.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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(317) 232-8603
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Rita Mann
Discount Labels, Inc.
4115 Profit Ct.
New Albany, IN 47150

DATE: May 14, 2013

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

SUBJECT: Final Decision
Registration
043-33021-00029

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:
Mike Gore, Responsible Official
Scott Fulton, Consultant, August Mack Environmental, Inc.
Ms. Marjorie J. Fitzpatrick, Consultant, IES Engineers

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	PWAY 5/14/2013 Discount Labels, Inc. 043-33021-00029 (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	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Rita Mann Discount Labels, Inc. 4115 Profit Ct New Albany IN 47150 (Source CAATS)										
2		Mike Gore GM Discount Labels, Inc. PO Box 709 New Albany IN 47150 (RO CAATS)										
3		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
4		Floyd County Commissioners 2524 Corydon Pike, Ste 204 New Albany IN 47150 (Local Official)										
5		New Albany City Council and Mayors Office City County Building #316 New Albany IN 47150 (Local Official)										
6		Floyd County Health Department 1917 Bono Rd New Albany IN 47150-4607 (Health Department)										
7		Ms. Sue Green 1985 Kepley Road Georgetown IN 47122 (Affected Party)										
8		Scott Fulton August Mack Environmental, Inc. 1302 N. Meridian Street, Suite 300 Indianapolis IN 46202 (Consultant)										
9		Ms. Marjorie J Fitzpatrick IES Engineers 1720 Walton Rd Blue Bell PA 19422 (Consultant)										
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