



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant
DATE: September 10, 2013
RE: EPI Printers, Inc. / 097 - 33023 - 00711
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 6/13/13



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

EPI Printers, Inc.
7502 E. 86th Street
Indianapolis, Indiana 46256

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M097-33023-00711	
Issued by: <i>Tripurari P. Sinha</i> Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 10, 2013 Expiration Date: September 10, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary Commercial Printing Operation.

Source Address:	7502 E. 86th Street, Indianapolis, Indiana 46256
General Source Phone Number:	317-579-4870
SIC Code:	2752 & 2759
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) Multi-Colored sheetfed lithographic printing presses consisting of two (2) 2C 40" Heidelberg sheetfed perfecter printing press and two (2) 6C Main Roland sheet fed offset printing press, identified as SH-1, SH-2, SH-3 & SH-4 respectively, constructed in 1997, 1998, 2002 & 2006 respectively, with a maximum capacity of 7,000, 7,000, 8,000 & 10,000 impressions per hour (IPH) respectively, and exhausting to heat and moisture stack.
- (b) One (1) Multi-Colored non heatset lithographic printing press (2C Harris V15 38"), identified as NH-1, constructed in 2004, with a maximum capacity of 10,000 impressions per hour (IPH) and exhausting inside the building.
- (c) One (1) Multi-Colored heatset web offset lithographic printing press (Baker-Perkins 5C 36"), identified as HW-1, constructed in 2013, with a maximum capacity of 30,000 impressions per hour (IPH), equipped with a dryer with a maximum heat input capacity of 2.2 MMBtu/hr, using regenerative thermal oxidizer, identified as R-01 as control which is fueled by a natural gas with a maximum heat input capacity of 1.15 MMBtu/hr, and exhausting to stack 01.
- (d) One (1) 8C Webtron flexographic printing press, identified as FL-1, constructed in 1995, with a maximum capacity of 250 ft/min, equipped with infrared heater, identified as IR Heater, and exhausting inside the building.

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-33023-00711, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5 (f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

- (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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedances of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M097-33023-00711 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control

requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) Multi-Colored heatset web offset lithographic printing press (Baker-Perkins 5C 36"), identified as HW-1, constructed in 2013, with a maximum capacity of 30,000 impressions per hour (IPH), equipped with a dryer (D-01) with a maximum heat input capacity of 2.2 MMBtu/hr, using regenerative thermal oxidizer, identified as R-01 as control which is fueled by a natural gas with a maximum heat input capacity of 1.15 MMBtu/hr, and exhausting to stack 01.

(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 (VOC) BACT Limitations [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the heatset web offset lithographic printing press, identified as HW-1, shall be as follows:

- (a) The VOC emissions from the dryer of the Heatset Web Offset Lithographic Printing Press (HW-1) shall be controlled through the use a Regenerative Thermal Oxidizer, identified as R-01 with a VOC destruction efficiency of greater than or equal to 98% and control emissions from the heatset web offset lithographic printing press (HW-1) at all the times when the printing press HW-1 is in operation.
- (b) The press dryer (D-01) associated with heatset web offset lithographic printing press (HW-1) shall operate at a negative air flow pressure (relative to surrounding room).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

To demonstrate compliance with Condition D.1.1, VOC emissions from HW-1 printing press, shall be determined after the effect of the regenerative thermal oxidizer (identified as R-01). To determine the VOC input in the regenerative thermal oxidizer, the Permittee shall use a VOC retention factor of 20% for the heatset inks. The capture efficiency shall comply with the following:

- (1) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):
- (A) 100 percent capture, by weight, of the VOC in press ready inks;
- (B) 70 percent capture, by weight, of the VOC in press ready fountain solutions;

- (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
 - (D) 20 percent retention, by weight, of VOC in inks in the paper substrate; and
 - (E) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.
- (2) The press dryers used in conjunction with HW-1 shall operate at a negative air flow pressure (relative to the surrounding room).

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with condition D.1.1 - VOC BACT, not later than 180 days after the issuance date of this permit, Permit M097-33023-00711, the Permittee shall perform VOC testing of the Regenerative Thermal Oxidizer (R-01) utilizing method approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.5 Thermal Oxidizer Temperature [326 IAC 8-1-6]

A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per 15 minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Whenever the three (3) hour average temperature is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the temperature shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.6 Parametric Monitoring

- (a) The Permittee shall determine the appropriate range of fan amperage or duct pressure for the thermal oxidizer from the most recent valid stack test that demonstrates compliance with the limit set by Conditions D.1.1 as approved by IDEM.
- (b) The fan amperage or duct pressure, whichever is monitored by the Permittee under this condition shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.1.7 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Conditions D.1.1.
 - (1) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Daily records of the duct pressure or fan amperage for the thermal oxidizer.
 - (3) Daily records shall be kept of observing the dryer blower is operating properly and the dryer negative pressure is maintained during routine printing operation of the heatset web press.
 - (4) Records of the VOC destruction efficiency and a description of the data used to establish the capture and destruction efficiencies.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	EPI Printers, Inc.
Address:	7502 E. 86th Street
City:	Indianapolis, Indiana 46256
Phone #:	317-579-4870
MSOP #:	M097-33023-00711

I hereby certify that EPI Printers, Inc. is :

still in operation.

no longer in operation.

I hereby certify that EPI Printers, Inc. is :

in compliance with the requirements of MSOP M097-33023-00711.

not in compliance with the requirements of MSOP M097-33023-00711.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. (_____) _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____

INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:

MEASURES TAKEN TO MINIMIZE
EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL*
SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO
PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO
EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF
APPLICABLE) _____

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

MALFUNCTION RECORDED
BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Mail to: Permit Administration and Support Section

Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

EPI Printers, Inc.
7502 E. 86th Street
Indianapolis, Indiana 46256

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that EPI Printers, Inc. 7502 E. 86th Street, Indianapolis, Indiana 46256, completed construction of the Commercial Printing Operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on ***Reviewer: Insert date application received at IDEM*** and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-33023-00711, Plant ID No. 097-00711 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or

printed)

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

Addendum to the Technical Support Document (TSD)
for a Minor Source Construction and Minor Source Operating Permit

Source Description and Location

Source Name:	EPI Printers, Inc.
Source Location:	7502 E. 86th Street, Indianapolis, IN 46256
County:	Marion
SIC Code:	2752 & 2759
Operation Permit No.:	097-33023-00711
Permit Reviewer:	Muhammad D. Khan

Public Notice Information

On June 22, 2013, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that EPI Printers, Inc. had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to operate a commercial printing press. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments Received from Source and IDEM's Responses

No changes have been made to the Technical Support Document because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision. (deleted language appears as ~~strikeout~~ and the new language **bolded**):

Comment #1: EPI Printers, Inc. requested to revise the language for Conditions D.1.3(2) and D.1.7(a)(3) regarding using differential pressure gauges at inlet and outlet of the dryer. The source requested that it is not physically possible to hook the pressure gauges at the inlet and outlet of the dryer.

Response #1: IDEM agrees to revise the language for Condition D.1.7(a)(3).

Conditions D.1.3(2) and D.1.7(a)(3) of the permit is modified as follows:

D.1.3 Volatile Organic Compounds (VOC)

- (2) The press dryers used in conjunction with HW-1 shall operate at a negative air flow pressure (relative to the surrounding room). ~~Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.~~

D.1.7 Record Keeping Requirement

- (3) Daily records shall be kept **of observing the dryer blower is operating properly and the dryer negative pressure is maintained during routine printing operation of the heatset web press** ~~using differential pressure gauges with one inlet of each gauge being within the dryer and the other inlet of the gauge being open to the ambient air in the press room.~~

Other Changes

Upon further review IDEM, OAQ has made the following changes to the Permit and BACT of the Minor Source Operating Permit No. 097-33023-00711. (deleted language appears as ~~strikeout~~ and the new language **bolded**):

- Change 1:** Demonstration of negative air flow pressure in dryer by using differential pressure guage has been removed from the Condition D.1.1(b) and Appendix B - BACT Analysis because it is not a VOC BACT limit, it is compliance demonstration and the source is not able to show compliance using differential pressure gauge because it is practically not feasible to install the gauges. The compliance with maintaining negative air pressure in the dryer shall be demonstrated by showing the dryer blower is operating properly and the dryer negative pressure is maintained during routine printing operation as mentioned in Condition D.1.7(a)(3) of the permit.

Condition D.1.1 of the permit and Step 5 of Appendix B - BACT Analysis are modified as follows:

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

- (b) The press dryer (D-01) associated with heatset web offset lithographic printing press (HW-1) shall operate at a negative air flow pressure (relative to surrounding room). ~~Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.~~

Indiana Department of Environmental Management Office of Air Quality

Appendix B – BACT Analyses Technical Support Document (TSD)

Step 5: Select BACT

- (b) The press dryer (D-01) associated with heatset web offset lithographic printing press (HW-1) shall operate at a negative air flow pressure (relative to surrounding room). ~~Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.~~

IDEM Contact

Questions regarding this proposed permit can be directed to:

Muhammad D. Khan
Indiana Department Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, Room 1003
Indianapolis, Indiana 46204-2251
Toll free (within Indiana): 1-800-451-6027 extension 3-9664
Or dial directly: (317) 233-9664
MKhan1@idem.in.gov

Please refer to MSOP Permit No. 097-33023-00711 in all correspondence.

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

Technical Support Document (TSD) for a New Source Construction, New Source Review and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name: EPI Printers, Inc.
Source Location: 7502 E. 86th Street, Indianapolis, IN 46256
County: Marion
SIC Code: 2752 & 2759
Operation Permit No.: 097-33023-00711
Permit Reviewer: Muhammad D. Khan

On April 1, 2013, the Office of Air Quality (OAQ) received an application from EPI Printers, Inc. related to the construction and operation of new emission units and the continued operation of an existing stationary commercial printing operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when

evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. 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**
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by EPI Printers, Inc. on April 1, 2013, relating to the operation of an existing stationary commercial printing facility.

- (a) Four (4) Multi-Colored sheetfed lithographic printing presses consisting of two (2) 2C 40" Heidelberg sheetfed perfecter printing press and two (2) 6C Main Roland sheet fed offset printing press, identified as SH-1, SH-2, SH-3 & SH-4 respectively, constructed in 1997, 1998, 2002 & 2006 respectively, with a maximum capacity of 7,000, 7,000, 8,000 & 10,000 impressions per hour (IPH) respectively, and exhausting to heat and moisture stack.
- (b) One (1) Multi-Colored non heatset lithographic printing press (2C Harris V15 38"), identified as NH-1, constructed in 2004, with a maximum capacity of 10,000 impressions per hour (IPH) and exhausting inside the building.
- (c) One (1) Multi-Colored heatset web offset lithographic printing press (Baker-Perkins 5C 36"), identified as HW-1, constructed in 2013, with a maximum capacity of 30,000 impressions per hour (IPH), equipped with a dryer with a maximum heat input capacity of 2.2 MMBtu/hr, using regenerative thermal oxidizer, identified as R-01 as control which is fueled by a natural gas with a maximum heat input capacity of 1.15 MMBtu/hr, and exhausting to stack 01.
- (d) One (1) 8C Webtorn flexographic printing press, identified as FL-1, constructed in 1995, with a maximum capacity of 250 ft/min, equipped with infrared heater, identified as IR Heater, and exhausting inside the building.

Enforcement Issues

As mentioned in the Permit application the source is operating since 1995 but there emissions are below exempt level before the installation of heatset web offset lithographic printing press that has been constructed in January 2013.

IDEM is aware that heatset web offset lithographic printing press (HW-1) has been constructed 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 – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.03
PM10 ⁽¹⁾	0.11
PM2.5	0.11
SO ₂	0.01
NO _x	1.44
VOC	38.08
CO	1.21
GHGs as CO ₂ e	1,737

(1) 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) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP	0.14 (Toluene)
TOTAL HAPs	0.37

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC are less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Sheetfed Printing Presses (SH-1, SH-2, SH-3 & SH-4)	0	0	0	0	0	9	0	0	0.26	0.14 (Toluene)
Harris web Printing Press (NH-1)	0	0	0	0	0	0.45	0	0	0.018	0.01 (Toluene)
Flexographic Printing Press (FL-1)	0	0	0	0	0	0.07	0	0	0.016	0.016 (EGME)
Baker Perkins Printing Press (HW-1)	0	0	0	0	0	0.57	0	0	0.046	0.03 (Xylene)
Dryer (D-01) & RTO-01 (Combustion)	0.03	0.11	0.11	0.01	1.44	0.08	1.21	1,737	0.03	0.03 (Hexane)
Total PTE of Entire Source	0.03	0.11	0.11	0.01	1.44	10.17	1.21	1,737	0.37	0.14 (Toluene)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	100	100	100	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

Federal Rule Applicability Determination

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 this source uses non heatset, heatset sheetfed lithographic printing, heatset, non heatset web lithographic printing and flexographic printing. All of these presses use plates and not the gravure cylinder to transfer images as defined in subpart QQ, so none of the facilities are publication 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 Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included for this proposed revision, since none of the presses at this source use a gravure cylinder as defined in 40 CFR 60.581, so none of the press operations constitute a rotogravure printing line.
- (d) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included for this proposed revision, since this source has no process which applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. Additionally, 60.740(d)(3) states that Web coating operations that print an image on the surface of the substrate or any coating applied on the same printing line that applies the image are not subject to this subpart.
- (e) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63.820, Subpart KK (326 IAC 20-18), are not included for this proposed revision, since this source is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating 40 CFR 63.3280, Subpart JJJJ (326 IAC 20-65), are not included for this proposed revision, since this source is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63.4280, Subpart OOOO (326 IAC 20-77), are not included for this proposed revision, since this source is not a major source of HAPs.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all regulated pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (c) 326 IAC 2-3 (Emission Offset) and (for PM2.5 nonattainment counties) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

Heatset Lithographic Web Printing Press (HW-1)

- (h) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule requires that new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using Best Available Control Technology (BACT).

The potential VOC emissions from heatset web printing press identified as HW-1 is greater than twenty five (25) tons per year. Therefore, press HW-1 is subject to the provisions of 326 IAC 8-1-6.

Pursuant to 326 IAC 8-1-6, IDEM has established BACT for VOC for the Heatset lithographic web printing press, identified as HW-1 as follows:

The VOC emissions from the heatset lithographic web printing press (HW-1) shall be controlled through the use of a Regenerative Thermal Oxidizer, identified as R-01, with a minimum of 98% destruction efficiency for VOC.

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

This press (HW-1) is not subject to 326 IAC 8-2-5 because web coating in lithography is not considered paper and other web coating operation as defined in 40 CFR 63 subpart JJJJ.

- (j) 326 IAC 8-5-5 (Graphic Arts Operations)
 The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to this press (HW-1) because the rule pertains to publication rotogravure, packaging rotogravure, and flexographic printing presses.
- (k) 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing)
 This press (HW-1) is not subject to 326 IAC 8-16 (Offset Lithographic Printing and Letterpress Printing), because this source is not located in Lake or Porter County. This source is located in Marion County.

Sheetfed Offset Lithographic Printing Press (SH-1, SH-2, SH-3, & SH-4) & Non Heatset Lithographic Web Printing Press (NH-1)

- (l) 326 IAC 8-1-6 (New facilities; general reduction requirements)
 The provisions of 326 8-1-6 do not apply to these units, because the potential emissions are less than 25 tons of VOC per year each.
- (m) There are no other 326 IAC 8 Rules that are applicable to the SH-1, SH-2, SH-3, SH-4 and NH-1.

Flexographic Printing Press (FL-1)

- (n) 326 IAC 8-1-6 (New facilities; general reduction requirements)
 The provisions of 326 8-1-6 do not apply to this unit, because the potential emissions are less than 25 tons of VOC per year.
- (o) 326 IAC 8-5-5 (Graphic Arts operations)
 The provisions of 326 8-1-6 do not apply to this unit, because it is a flexographic printing press with the potential emissions less than 25 tons of VOC per year.
- (p) There are no other 326 IAC 8 Rules that are applicable to the FL-1.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Control	Operating Parameters	Frequency	Range	Excursions and Exceedances
Regenerative Thermal Oxidizer R-01	Temperature	Continuous	3 hr average temperature established during the latest stack test	Response Steps

- (1) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):

- (A) 100 percent capture, by weight, of the VOC in press ready inks;

- (B) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
 - (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
 - (D) 20 percent retention, by weight, of VOC in inks in the paper substrate; and
 - (E) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.
- (2) The press dryers used in conjunction with HW-1 shall operate at a negative air flow pressure (relative to the surrounding room). Demonstration of the negative air flow pressure shall be verified using a differential pressure gauge across the dryer inlets and outlets.

These compliance monitoring requirements are necessary to ensure compliance with the provisions of 326 IAC 8-1-6.

- (b) The testing requirements applicable to this source are as follows:

Testing Requirements					
Emission Unit	Control Device	Pollutant	Parameter	Timeframe for Testing	Frequency of Testing
HW-1	Regenerative Thermal Oxidizer R-01	VOC	Temperature	Not Later than 180 days after the issuance of this permit	Every five (5) years

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 1, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 097-33023-00711. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Muhammad D. Khan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Appendix A: Emissions Calculations

Summary

Company Name: EPI Printers, Inc.
Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
Permit Number: 097-33023-00711
Pit ID: 097-00711
Reviewer: Muhammad D. Khan
Date: 4/25/2013

Unit ID	Uncontrolled Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG	Total HAPs	Single HAP	
Sheetfed Printing Presses (SH-1, SH-2, SH-3 & SH-4)	0	0	0	0	0	9	0	0	0.26	0.14	Toluene
Harris web Printing Press (NH-1)	0	0	0	0	0	0.45	0	0	0.018	0.01	Toluene
Flexographic Printing Press (FL-1)	0	0	0	0	0	0.07	0	0	0.016	0.016	Ethylene Glycol Mono. Ether
Baker Perkins Printing Press (HW-1)	0	0	0	0	0	28.48	0	0	0.046	0.03	Xylene
Dryer (D-01) & RTO-01 (Combustion)	0.03	0.11	0.11	0.01	1.44	0.08	1.21	1,737	0.03	0.03	Hexane
Total	0.03	0.11	0.11	0.01	1.44	38.08	1.21	1737	0.37	0.14	Toluene

Unit ID	Limited Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG	Total HAPs	Single HAP	
Sheetfed Printing Presses (SH-1, SH-2, SH-3 & SH-4)	0	0	0	0	0	9	0	0	0.26	0.14	Toluene
Harris web Printing Press (NH-1)	0	0	0	0	0	0.45	0	0	0.018	0.01	Toluene
Flexographic Printing Press (FL-1)	0	0	0	0	0	0.07	0	0	0.016	0.016	Ethylene Glycol Mono. Ether
Baker Perkins Printing Press (HW-1)	0	0	0	0	0	0.57	0	0	0.046	0.03	Xylene
Dryer (D-01) & RTO-01 (Combustion)	0.03	0.11	0.11	0.01	1.44	0.08	1.21	1,737	0.03	0.03	Hexane
Total	0.03	0.11	0.11	0.01	1.44	10.17	1.21	1737	0.37	0.14	Toluene

Appendix A: Emissions Calculations

VOC & HAPs Emissions From Sheetfed Printing Presses (SH-1, SH-2, SH-3 & SH-4)

Company Name: EPI Printers, Inc.
Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
Permit Number: 097-33023-00711
Plt ID: 097-00711
Reviewer: Muhammad D. Khan
Date: 4/25/2013

INK VOCS					
Ink Name Press Id	Maximum Ink Usage Rate (lbs/hr)	Maxium Usage (lbs/year)	Weight % Volatiles	Flash Off %	Emissions (TONS/YEAR)
Envirotech PC Black Ink Non-Heatset Sheetfed Offset Lithographic Press	1.37	12,001	2.25%	5.00%	0.01
Aqueous Coating	5.71	50019.6	1%	100.00%	0.25

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (pounds per year) * Weight percentage volatiles (water minus organics) * Flash off * Tons per 2000 pounds

NOTE: NON-HEAT SET OFFSET LITHOGRAPHIC PRINTING HAS FLASH OFF OF 5%.

FLASH OFF% is determined from the EPA document 'Control technique Guidelines for Offset Lithographic Printing and Letterpress Printing' EPA 453/R-06-002, September 2006.

Miscellaneous Materials VOCS	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % Volatiles	Emissions (TONS/YEAR)
Varn ABC Wash	1540	6.51	100%	5.01
Metering Roller Cleaner	36	6.36	100%	0.11
Millennium Fountain Solution	660	4.85	100%	1.60
Isopropyl Alcohol	440	6.58	100%	1.45
Scratch Remover	60	1.3	100%	0.04
Ancolite Glaze Remover	75	5.28	100%	0.20
Image Plate Cleaner (Quart)	120	5.56	100%	0.33

Total VOC Emissions from SH-1, SH-2, SH-3 & SH-4 =	9 tons/year
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METHODOLOGY

VOC (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage volatiles (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

HAPS Emissions

	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % HAP	Emissions (TONS/YEAR)
Methanol	75	6.94	24%	0.06
Toluene	75	6.94	52%	0.14
Cumene	1540	6.66	1%	0.03
Xylene	1540	6.66	1%	0.04
Total HAPs =				0.26

METHODOLOGY

HAP (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage HAP (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

Ancolite Glaze Remover contain 23.88% Methanol and 52.33% Toluene.

Varn ABC Wash contains 0.5% Cumene and 0.75% Xylene

Appendix A: Emissions Calculations**VOC & HAPs Emissions From Harris Non-Heatset Web Printing Press (NH-1)**

Company Name: EPI Printers, Inc.
Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
Permit Number: 097-33023-00711
Plt ID: 097-00711
Reviewer: Muhammad D. Khan
Date: 4/25/2013

INK VOCS					
Ink Name Press Id	Maximum Ink Usage Rate (lbs/hr)	Maxium Usage (lbs/year)	Weight % Volatiles	Flash Off %	Emissions (TONS/YEAR)
Web HS Blue Book Black Non-Heatset Web Offset Lithographic Press	0.69	6,044	33.72%	5.00%	0.05

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (pounds per year) * Weight percentage volatiles (water minus organics) * Flash off * Tons per 2000 pounds

NOTE: NON-HEAT SET OFFSET LITHOGRAPHIC PRINTING HAS FLASH OFF OF 5%.

FLASH OFF% is determined from the EPA document 'Control technique Guidelines for Offset Lithographic Printing and Letterpress Printing' EPA 453/R-06-002, September 2006.

Miscellaneous Materials VOCS	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % Volatiles	Emissions (TONS/YEAR)
Varn ABC Wash	55	6.51	100%	0.18
Millennium Fountain Solution	55	4.85	100%	0.13
Scratch Remover	12	6	100%	0.04
Ancolite Glaze Remover	6	5.28	100%	0.02
Image Plate Cleaner (Quart)	12	5.56	100%	0.03

Total VOC Emissions from NH-1 =	0.45 tons/year
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METHODOLOGY

VOC (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage volatiles (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

HAPS Emissions

	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % HAP	Emissions (TONS/YEAR)
Methanol	6	6.94	24%	0.005
Toluene	6	6.94	52%	0.011
Cumene	55	6.66	1%	0.001
Xylene	55	6.66	1%	0.001
			Total HAPs =	0.018

METHODOLOGY

HAP (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage HAP (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

Ancolite Glaze Remover contain 23.88% Methanol and 52.33% Toluene.

Varn ABC Wash contains 0.5% Cumene and 0.75% Xylene.

Appendix A: Emissions Calculations
VOC & HAPs Emissions From Baker Perkins-Heatset Web Printing Press (HW-1)
 Company Name: EPI Printers, Inc.
 Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
 Permit Number: 097-33023-00711
 Plt ID: 097-00711
 Reviewer: Muhammad D. Khan
 Date: 4/25/2013

Uncontrolled Emissions:

INK VOCS					
Press Id	Maximum Ink Usage Rate (lbs/hr)	Maximum Usage (lbs/year)	Weight % Volatiles	Flash Off %	Emissions (TONS/YEAR)
Heatset Web Offset Lithographic Press					
Black Ink	-	50,000	38%	80%	7.60
Cyan Ink	-	30,000	40%	80%	4.80
Magenta Ink	-	30,000	39%	80%	4.68
Yellow Ink	-	40,000	45%	80%	7.20

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (pounds per year) * Weight percentage volatiles (water minus organics) * Flash off * Tons per 2000 pounds
 NOTE: HEAT SET OFFSET LITHOGRAPHIC PRINTING HAS FLASH OFF OF 80%.

FLASH OFF% is determined from the EPA document 'Control technique Guidelines for Offset Lithographic Printing and Letterpress Printing' EPA 453/R-06-002, September 2006.

Miscellaneous Materials VOCS	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % Volatiles	Emissions (TONS/YEAR)
Varn ABC Wash	1100	6.51	100%	3.58
Starfount WP-976R Fountain sloution	1320	0.73	100%	0.48
Scratch Remover	24	6	100%	0.07
Image Plate Cleaner (Quart)	24	5.56	100%	0.07

Total VOC Emissions from NH-1 =	28.48 tons/year
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METHODOLOGY

VOC (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage volatiles (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

HAPS Emissions

	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % HAP	Emissions (TONS/YEAR)
Cumene	1100	6.66	1%	0.02
Xylene	1100	6.66	1%	0.03
Total HAPs =				0.046

METHODOLOGY

HAP (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage HAP (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds
 Varn ABC Wash contains 0.5% Cumene and 0.75% Xylene.

Controlled VOC Emissions:

INK VOCS						
Press Id	Maximum Ink Usage Rate (lbs/hr)	Maximum Usage (lbs/year)	Weight % Volatiles	Flash Off %	Destruction Efficiency of Thermal Oxidizer	Emissions (TONS/YEAR)
Heatset Web Offset Lithographic Press						
Black Ink	-	50,000	38%	80%	98%	0.15
Cyan Ink	-	30,000	40%	80%	98%	0.10
Magenta Ink	-	30,000	39%	80%	98%	0.09
Yellow Ink	-	40,000	45%	80%	98%	0.14

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (pounds per year) * Weight percentage volatiles (water minus organics) * Flash off * Tons per 2000 pounds
 NOTE: HEAT SET OFFSET LITHOGRAPHIC PRINTING HAS FLASH OFF OF 80%.

FLASH OFF% is determined from the EPA document 'Control technique Guidelines for Offset Lithographic Printing and Letterpress Printing' EPA 453/R-06-002, September 2006.

Miscellaneous Materials VOCS	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % Volatiles	Destruction Efficiency of Thermal Oxidizer	Emissions (TONS/YEAR)
Varn ABC Wash	1100	6.51	100%	98%	0.07
Starfount WP-976R Fountain sloution	1320	0.73	100%	98%	0.010
Scratch Remover	24	6	100%	98%	0.001
Image Plate Cleaner (Quart)	24	5.56	100%	98%	0.001

Total VOC Emissions from NH-1 =	0.57 tons/year
--	-----------------------

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage volatiles (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

Appendix A: Emissions Calculations

Natural Gas Combustion - Dryer (D-01) and RTO (R-01)

Company Name: EPI Printers, Inc.
Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
Permit Number: 097-33023-00711
Pit ID: 097-00711
Reviewer: Muhammad D. Khan
Date: 4/25/2013

Dryer D-01 = 2.20 MMBtu/hr
 RTO-01 = 1.15 MMBtu/hr

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.4	1020	28.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.11	0.11	0.01	1.44	0.08	1.21

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.021E-05	1.726E-05	1.079E-03	2.589E-02	4.891E-05	2.707E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.193E-06	1.582E-05	2.014E-05	5.466E-06	3.021E-05	7.883E-05

Methodology is the same as above.

Total HAPs	2.715E-02
Worst HAP	2.589E-02

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,726	0.0	0.0
Summed Potential Emissions in tons/yr	1,726		
CO2e Total in tons/yr	1,737		

Methodology

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

Appendix A: Emissions Calculations
VOC & HAPs Emissions From Flexographic Printing Press (FL-1)
Company Name: EPI Printers, Inc.
Address City IN Zip: 7502 E 86th Street, Indianapolis, IN 46256
Permit Number: 097-33023-00711
Pit ID: 097-00711
Reviewer: Muhammad D. Khan
Date: 4/25/2013

INK VOCS					
Press Id	Maximum Ink Usage Rate (lbs/hr)	Maxium Usage (lbs/year)	Weight % Volatiles	EF %	Emissions (TONS/YEAR)
Flexographic Printing Press					
Flexo Ink	-	4,000	2%	100.00%	0.0398
Vinyl Ink	-	1,000	3%	100.00%	0.0150
Print Clean (additive)	-	6	45%	100.00%	0.0014
Refresher (additive)	-	6	12%	100.00%	0.0003
UV Coatings	-	600	0%	100.00%	0

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (pounds per year) * Weight percentage volatiles (water minus organics) * EF * Tons per 2000 pounds

Miscellaneous Materials VOCS	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % Volatiles	Emissions (TONS/YEAR)
Sonic Kleen Roller Cleaner	72	0.45	100%	0.02

Total VOC Emissions from NH-1 = 0.07 tons/year

METHODOLOGY

VOC (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage volatiles (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

HAPS Emissions

	Maximum Usage (gal/yr)	Density (lb/gal)	Weight % HAP	Emissions (TONS/YEAR)
Ethylene Glycol Mono. Ether	72	0.45	100%	0.016
Total HAPs =				0.016

METHODOLOGY

HAP (Tons per Year) = Maximum Usage (gallons per year) * Weight percentage HAP (water minus organics) * Density (lbs/gal) * Tons per 2000 pounds

Sonic Kleen Roller Cleaner contains Ethylene Glycol mono. Ether

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

Appendix B – BACT Analyses
Technical Support Document (TSD)

Source Background and Description

Source Name:	EPI Printers, Inc.
Source Location:	7502 E. 86th Street, Indianapolis, IN 46256
County:	Marion
SIC Code:	2752 & 2759
Operation Permit No.:	097-33023-00711
Permit Reviewer:	Muhammad D. Khan

Proposed Construction

On April 1, 2013, the Office of Air Quality (OAQ) received an application from EPI Printers, Inc. relating to the construction and operation of a stationary commercial printing facility. EPI Printers, Inc. is proposing to install a new source in Marion County. The proposed facility will consist of four (4) sheetfed lithographic printing press, one (1) non heatset lithographic printing press, one (1) heatset web offset lithographic printing press and one (1) flexographic printing press.

Summary of Best Available Control Technology (BACT) Process

BACT is an emission limitation or equipment standard based on the maximum degree of pollution reduction of emissions, which is determined to be achievable on a case-by-case basis. BACT analysis takes into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, work practices, and operational limitations.

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by regulation or permit, or controls achieved in practice. The highest level of control is then evaluated for technical feasibility.

The five (5) basic steps of a top-down BACT analysis used by the Office of Air quality (OAQ) to make BACT determination are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies, and controls applied to similar source categories.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering, and source-specific factors related to safe and successful use of the controls. Innovative control means a control that has not been demonstrated in a commercial application on similar units. Only available and proven control technologies are evaluated. A control technology is considered available when there are sufficient data indicating that the technology results in a reduction in emissions of regulated pollutants.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. The ranked alternatives are reviewed in terms of environmental, energy, and economic impacts specific to the proposed modification. If the analysis determines that the evaluated alternative is not appropriate as BACT due to any of the impacts, then the next most effective is evaluated. This process is repeated until a control alternative is chosen as BACT. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step begins with an evaluation of the remaining technologies under consideration for each pollutant of concern in regards to energy, environmental, and economic impacts for determining a final control technology. The highest ranked alternative is evaluated for environmental, energy and economic impacts specific to the proposed modification. If the analysis determines that the highest ranked control is not appropriate as BACT, due to any of the energy, environmental, and economic impacts, then the next most effective control is evaluated. The evaluation continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical, economic or environmental analysis for a pollutant BACT.

Step 5: Select BACT

The most effective option not eliminated in step 4 is BACT.

Volatile Organic Compounds (VOC) BACT - Heatset Web Offset Lithographic Printing Press

The requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) applies to facilities located anywhere in the state that are constructed on or after January 1, 1980, which have potential volatile organic compounds (VOC) emissions greater than 25 tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8 rule, and requires the reduction of VOC emissions using Best Available Control Technology (BACT). The proposed Heatset Lithographic Web Printing Press, identified as HW-1 has potential VOC emissions of greater than 25 tons per year and therefore subject to the requirements of this rule.

326 IAC 8-1-6 requires a best available control technology (BACT) review to be performed on the following proposed new emission unit:

- (1) One (1) Multi-Colored heatset web offset lithographic printing press (Baker-Perkins 5C 36"), identified as HW-1, constructed in 2013, with a maximum capacity of 30,000 impressions per hour (IPH), equipped with a dryer with a maximum heat input capacity of 2.2 MMBtu/hr, using regenerative thermal oxidizer, identified as R-01 as control which is fueled by a natural gas with a maximum heat input capacity of 1.15 MMBtu/hr, and exhausting to stack 01.

Step 1: Identify Potential Control Technologies

For heatset lithographic printing presses the available add-on control technologies to control the VOC emissions from the dryers of the press are:

1. Cooling and Condensing System
2. Carbon Adsorption
3. Thermal Oxidizer
4. Catalytic Thermal Oxidizer
5. Regenerative Thermal Oxidizer

Step 2: Eliminate Technically Infeasible Options

The test for technical feasibility of any control option is whether it is both available and applicable in reducing VOC emissions. The control technologies listed in the step 1 are discussed and evaluated below for their technical feasibility.

1. Cooling and Condensing System

This type of VOC emissions control system uses a combination of a cooling and condensing system to extract the ink oil (VOCs) from the hot dryer exhaust and an activated carbon bed system to absorb the residual VOCs. The reported efficiency is around 80%. Refrigerated condensers are used as air pollution control devices for treating emission streams with high VOC concentrations (usually > 5,000 ppmv). Condensers may be used to control VOC emissions with high VOC concentrations (usually greater than 5,000 ppmv).

Cooling and condensation is not feasible as a proposed emission control system because it cannot meet the control efficiency requirement set by local, state and federal air pollution control agencies. These systems are typically used when the exhaust flow rates are low in order to reduce the amounts of refrigeration capacity needed to work effectively.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of Cooling and Condensing System is not a technically feasible option for the Heatset Web Offset Lithographic Printing operations at this source.

2. Carbon Adsorption

Carbon adsorption works through the preferential adsorption of the organic molecules from the effluent gas onto the surface of the solid granules of carbon where they are held by physical attraction. This control technology typically operates best with vapor streams that have low variation in volatile concentration and type. In effluent streams where there are multiple organic compounds present, competing adsorption occurs where a number of organics compete for the number of available adsorption sites on the carbon. This lessens the capture efficiency for some individual species. VOC removal efficiency for this type of system may vary depending on several factors, but are capable of achieving 90 to 99% removal efficiencies.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of Carbon Adsorption is not a technically feasible option for the Heatset Web Offset Lithographic Printing operations at this source because this technology is best suited for low variation in the type of concentration of VOC used and the VOC concentration used at HW-1 may vary.

3. Thermal Oxidizer

Thermal oxidation systems operate in three (3) stages: a burner generates hot combustion gases, combustion products mix with the exhaust from the process lines, and the mixture is oxidized.

Thermal incinerators operate at peak efficiency when oxidizing concentrated organic exhaust streams just above or below the upper and lower explosive limits. This is because the oxidation rate is directly proportional to the organic concentration, the local heat of reaction during oxidation, and the increased concentration of free radicals which participate in the oxidation reaction. Thermal oxidation destruction efficiency ranges from 95% to 99%.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of a thermal oxidizer is a technically feasible option for heatset web offset lithographic printing press (HW-1) at this source.

4. **Catalytic Thermal Oxidizer**

This type of thermal oxidizer is a better system than the straight-shot thermal oxidizer. It uses a heated catalytic (platinum coated ceramic beads) system to destroy VOCs at a much lower temperature (around 650°F) and consumes a lot less natural gas. A catalyst is an element or compound that speeds up a reaction at lower temperatures compared to thermal oxidation without undergoing change itself. Catalytic oxidizers approximately require 1.5 to 2.0 ft³ of catalyst per 1000 standard ft³ per gas flow rate. Even though this type of control system can normally reach over 98% destruction efficiency, its catalytic media is very expensive to upkeep and has to be replaced every 5 years or so. It also has an odor problem due to the lower combustion temperature.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of Catalytic Thermal Oxidizer is not a technically feasible option for the Heatset Web Offset Lithographic Printing operations at this source.

5. **Regenerative Thermal Oxidizer**

Thermal oxidizers destroy air toxics and organic compounds that are discharged in industrial process exhausts. Thermal oxidizers achieve destruction through the process of high temperature thermal oxidation, converting combustible compounds to carbon dioxide and water vapor, and oxidizing toxic compounds to non-toxic compounds. Some thermal oxidizers preheat the incoming air by capturing heat from the outgoing air stream to reduce operating costs. Regenerative thermal oxidizers use ceramic heat transfer beds to recover thermal energy from the oxidation process. The heat transfer beds act as heat exchangers. The heat recovery can be as much as 90 to 95%. Process gas enters the RTO through an inlet manifold. The gas is directed into an energy recovery chamber which preheats the process gas. The process gas and contaminants are progressively heated in the ceramic bed as they move toward the combustion chamber.

This is the most advanced type of add-on VOC emission control system that is available on the market for heatset web printing presses. It not only is able to use the heat generated by the combustion of the waste stream (ink oil) to burn the waste stream itself but also can get the destruction efficiency consistently over 98% without using a lot of natural gas.

The heating value of the stream to the RTO is very low because it contains mostly non-combustible CO₂ (98%). Consequently, each RTO will have a natural gas/SNG burner to raise the temperature in the combustion chamber of the RTO to approximately 1600 degrees F. This ensures a high oxidation efficiency of the CO (99%), CH₃OH (99%), H₂S (98%), and COS (98%). Most of this heat is recovered by heating one of the heat transfer beds which will be used subsequently to preheat the incoming gas stream (i.e., the two beds are alternated between incoming gas and exhaust gas). This reduces the supplementary fuel firing rate and associated combustion emissions.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of a regenerative thermal oxidizer is a technically feasible option for heatset web offset lithographic printing press (HW-1) at this source.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

EPI Printers, Inc. has opted to adopt the option with greatest control efficiency and technical feasibility. Therefore, it is unnecessary to discuss the feasibility of the potential control options with lesser control efficiencies. EPI Printers, Inc. has chosen the option of Regenerative Thermal Oxidizer for VOC control from heatset web offset Lithographic Printing Press (HW-1).

- (1) Regenerative Thermal Oxidizer (VOC Reduction > 98%)

Step 4: Evaluate the Most Effective Controls and Document the Results

The BACT analysis submitted by EPI Printers, Inc. for heatset web printing press (HW-1) was verified by IDEM, OAQ, through the review of various control technologies listed in U.S. EPA BACT/RACT/LAER Clearinghouse.

The following table lists the proposed VOC BACT determination for emissions sources having similar lithographic heatset web printing presses:

Date	State	Permit No.	Source	Affected Facility	Control Technology
Proposed	IN	M097-33023-00711	EPI Printers, Inc.	Heatset web offset Lithographic Printing Press	Regenerative Thermal Oxidizer with destruction efficiency of 98%
Public Notice	IN	F001-33085-00039	EP Graphics	Two heatset offset lithographic printing presses	(a) Thermal oxidation, 98 % destruction efficiency. (b) VOC content of fountain solution shall be no greater than 15% VOC as applied. (c) Blanket and roller washes shall have a vapor pressure no greater than 10 mmhg at 20°C or VOC limited to 70% or 7.0 lb/gal as applied.
01/2011	IN	F113-29548-00021	Courier Kendallville	Heatset offset Lithographic Printing	(a) Thermal oxidation, 98% destruction efficiency. (b) VOC content of fountain solution shall be no greater than 3% VOC as applied. (c) Blanket and roller washes shall have a vapor pressure no greater than 10 mm hg at 20°C or VOC limited to 70% or 5.6 lb/gal as applied.
10/2007	IN	T107-23347-00052	R.R. Donnelley & Sons Company	Heatset offset Lithographic Printing	(a) Thermal oxidation, 97 % destruction efficiency. (b) VOC content of fountain solution and wash: 5% VOC in fountain solution. (c) Blanket wash shall have a vapor pressure of 10 mmHg or 2.5 lb VOC/gal. (d) Manual cleaning solvent shall have 25 mm Hg vapor pressure or 2.5 lb VOC/gal
03/2005	WI	WI-0222	Quad-Graphics (Sussex)	Three (3) heatset offset Lithographic Printing Presses	(a) Thermal oxidation, 97.5% destruction efficiency. (b) Blanket wash shall have 10 mmHg vapor pressure

None of these projects incorporate a more effective technology or represent a more stringent emission limits for VOCs. Regenerative Thermal Oxidizer is the top control alternative to satisfy the BACT requirements of 326 IAC 8-1-6 (BACT), based on control efficiency and technical feasibility. In addition, it transforms waste into energy to burn the waste itself and reduce the use of natural gas dramatically. Furthermore, it not only reduces VOC emissions but also the emissions of greenhouse gases.

As the source has proposed to accept the top BACT, the economic, environmental, and energy impacts to the source have not been evaluated.

Step 5: Select BACT

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), IDEM has established the following BACT for VOC for Heatset Web Offset Lithographic Printing Press (HW-1):

- (a) The VOC emissions from the dryer of the Heatset Web Offset Lithographic Printing Press (HW-1) shall be controlled through the use a Regenerative Thermal Oxidizer, identified as R-01 with a VOC destruction efficiency of greater than or equal to 98% and control emissions from the heatset web offset lithographic printing press (HW-1) at all the times when the printing press HW-1 is in operation.
- (b) The press dryer (D-01) associated with heatset web offset lithographic printing press (HW-1) shall operate at a negative air flow pressure (relative to surrounding room).

IDEM Contact

Questions regarding this proposed permit can be directed to Muhammad D. Khan at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Dean Wolf
EPI Printers, Inc.
7502 E 86th St
Indianapolis, IN 46256

DATE: September 10, 2013

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

SUBJECT: Final Decision
New Construction MSOP
097 - 33023 - 00711

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:
Nelson Ho NEJC Consulting
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 10, 2013

TO: Marion County Library 7898 North Hague Rd Indianapolis IN

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

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

Applicant Name: EPI Printers, Inc.
Permit Number: 097 - 33023 - 00711

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 9/10/2013 EPI Printers, Inc. 097 - 33023 - 00711 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		Dean Wolf EPI Printers, Inc. 7502 E 86th St Indianapolis IN 46256 (Source CAATS) Via confirmed delivery										
2		Paragon Realty 7320 E 86th St Indianapolis IN 46256 (Affected Party)										
3		Waterside at Castleton 8380 Whipporwill Drive Indianapolis IN 46256 (Affected Party)										
4		Mike Peoni Dept of Metropolitan Development 1821 City/County Building Indianapolis IN 46204 (Affected Party)										
5		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
6		Marion County Library 7898 North Hague Rd Indianapolis IN 46256 (Library)										
7		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
8		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
9		Mr. Nelson Ho NEJC Consulting 10217 Garden Alcove Drive Tampa FL 33647 (Consultant)										
10		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
11		Castleton Nursing and Rehad Center 7630 E 86th St Indianapolis IN 46256 (Affected Party)										
12												
13												
14												
15												

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