



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: May 10, 2013

RE: EP Graphics, Inc. / 001-33085i-00039

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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May 10, 2013

Ms. Ann Kesler  
EP Graphics, Inc.  
169 South Jefferson Street  
Berne, Indiana 46711

Re: Interim Significant Source Modification Petition Approval  
001-33085i-00039

Dear Ms. Kesler:

On April 12, 2013, the Office of Air Quality (OAQ) received an interim Significant Source Modification petition from EP Graphics, Inc., located at 169 South Jefferson Street, in Berne, Indiana for construction of three (3) lithographic presses (two heatset, one non heatset) and two natural gas-fired dryers associated with the two heatset lithographic presses.

A public notice of the interim Significant Source Modification petition was published in Berne Tri-Weekly News on April 15, 2013. The public comment period ended on April 29, 2013.

There were no comments received during the public comment period. This interim Significant Source Modification petition is in effect upon issuance and will expire on the effective date of the final Significant Source Modification permit.

The interim Significant Source Modification petition may be revoked after the effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final Significant Source Modification permit is denied. The IDEM has reviewed this interim Significant Source Modification petition and has not found any such reason. The facilities subject to this approval may not operate until the final Significant Permit Modification is issued by OAQ.

The interim Significant Source Modification petition is federally enforceable. Detailed construction and operation conditions will be specified in the final Significant Source Modification permit 001-33085-00039.

If you have any questions regarding this interim Significant Source Modification petition, please contact Bruce Farrar, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Bruce Farrar or extension 4-5401, or dial (317) 234-5401.

Sincerely,



Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Enclosure: Interim Permit Evaluation (4 pages)

bf

cc: File – Adams County  
Adams County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch

Mr. Donald L. Taylor  
Bruce Carter Associates  
606 S. 4th Street  
Elkhart, IN 46516

## Indiana Department of Environmental Management Office of Air Management

### Interim Significant Permit Revision Evaluation Sheet

<b>Company Name:</b> EP Graphics, Inc.	
<b>Location:</b> 169 South Jefferson Street, Berne, Indiana 46711	<b>Permit No:</b> 001-33085i-00039
<b>Permit Reviewer:</b> Bruce Farrar	<b>Date Receipt of Application:</b> April 15, 2013
	<b>Date of review:</b> April 16, 2013
<b>Description of the interim construction:</b> construction of three lithographic presses	
<b>Public Notice Period</b> = 4/15/2013 to 4/29/2013	
<b>Public Notice Date + 3 days = 17 days =</b> 5/3/2013	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
  - (1) construction of a PSD source or PSD modification;
  - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
  - (3) any modification subject to 326 IAC 2-4.1.
- (c) Public notice comment period is 14 calendar days.

**Instructions: Check (✓) appropriate answers and make a recommendation.**

1. Did the applicant submit a written petition for an interim significant permit revision or significant source modification?

- Yes Go to question 2.  
 No Ignore verbal request.

2. Did the applicant pay the applicable interim permit fee? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.

- Yes Go to question 3.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

Comments: \_\_\_\_\_

3. Did the applicant state acceptance of federal enforceability of an interim significant permit revision or significant source modification?

- Yes Go to question 4.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?

- Yes Go to question 5.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).

5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim significant permit revision or significant source modification is issued), including, but not limited to:

- (a) Financial risk,
- (b) Risk that additional emission controls may be required,
- (c) Risk that the final significant permit revision or significant source modification may be denied.

- Yes Go to question 6.
- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).

6. Did the applicant begin construction prior to submitting the interim significant permit revision or significant source modification application?

- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
- No Go to question 7.

7. What is the type of the interim construction?

- New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
- Modification to an existing source Go to question 8.

8. Did the applicant present data in the interim significant permit revision or significant source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?

- Yes Go to question 9.
- No Deny the application pursuant to:  
326 IAC 2-13-1(c)(2)(B), for PSD;  
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;  
326 IAC 2-13-1(c)(2)(C), for state rules.

9. Is the proposed modification to be located in a nonattainment area?

- Yes Go to question 10.
- No Go to question 11.

County: Adams County

Comments: \_\_\_\_\_

10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?

- Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
- No Go to question 11.

11. Did the petition include a complete description of the process?

- Yes Go to question 12.
- No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).

12. Did the interim significant permit revision or significant source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.

- Yes Go to question 13.
- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?  
 Yes Go to question 14.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?  
 Yes Go to question 15.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?  
 Yes Go to question 16.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?  
 Yes Go to question 17.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).  
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim significant permit revision or significant source modification petition?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).  
 No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).  
 No Approve the interim significant permit revision or significant source modification petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.  
 Yes Go to question 21.  
 No Deny the application, pursuant to 326 IAC 2-13-1(e).
- Newspaper: Berne Tri-Weekly News
- Date of publication: April 15, 2013
21. Were comments received within seventeen (17) days after the public notice of the interim significant permit revision or significant source modification?  
(14 calendar days for comment period + 3 working days for mailing)  
 Yes Evaluate the comments received, and make a recommendation.  
 No Issue the final interim significant permit revision or significant source modification approval.

Comments: \_\_\_\_\_  
\_\_\_\_\_

Recommendation: \_\_\_\_\_

Date the applicant was informed of the decision: \_\_\_\_\_

Method of informing the applicant: \_\_\_\_\_

**EP Graphics  
Significant Permit Modification  
Uncontrolled Emissions**

	PM TPY	PM10 TPY	SO2 TPY	NOx TPY	VOC TPY	CO TPY	Cumene TPY	Xylene TPY	Glycol Ethers TPY	1,2,3 Trimethylbenzene TPY
Press 1 (68)	0	0	0	0	96.6	0	0.33	0.42	1.2	2.24
Press 3 (69)	0	0	0	0	50.02	0	0.17	0.22	0.62	1.16
Press 2 (58)	0	0	0	0	39.4	0	0.62	0.78	2.24	4.2
Dryers	0.03	0.118	0.009	1.55	0.09	1.3	NA	NA	NA	NA
	0.03	0.118	0.009	1.55	186.11	1.3	1.12	1.42	4.06	7.6
	Combined HAPS									
	14.2									

**EP Graphics  
Significant Permit Modification  
Controlled Emissions**

	PM TPY	PM10 TPY	SO2 TPY	NOx TPY	VOC TPY	CO TPY	Cumene TPY	Xylene TPY	Glycol Ethers TPY	1,2,3 Trimethylbenzene TPY
Press 1 (68)	0	0	0	0	14.5	0	0.12	0.15	0.44	0.83
Press 3 (69)	0	0	0	0	7.51	0	0.06	0.08	0.23	0.43
Press 2 (58)	0	0	0	0	39.4	0	0.62	0.78	2.24	4.2
Dryers	0.03	0.118	0.009	1.55	0.09	1.3	NA	NA	NA	NA
total	0.03	0.118	0.009	1.55	61.5	1.3	0.8	1.01	2.91	5.46
	Combined HAPS									
	10.18									

EP Graphics  
 Significant Permit Modification  
 Press Throughputs, Application Rates and Ink VOC content

Press Throughputs

Press number	Description	Heatset or Non heatset	Max Print Width inches	Max Press speed ft/min	Maximum Hourly Throughput MMsqin/hr	Maximum yearly Throughput MMsqin/yr
Press 1 (68)	Goss	Heatset	38	1400	38.3	335543
Press 3 (69)	Heidelberg	Heatset	20	1378	19.84	173826
Press 2 (58)	Daughpin	Non heatset	35	2844	71.67	627819

Application Rates and Sources

all inks (total)	Fountain Solution	Blanket Wash
lb/MMsqin	lb/MMsqin	lb/MMsqin
Press 1 (68) and 3 (69)	1.55	0.13
Press 2	1.46	0.13

Source: Ink application rates determined from 2012 purchasing and production records  
 Fountain Solution and Blanket Wash application rates based on TSD from 069-25446-00059

Heatset Inks and Worse Case

Product	Color	Weight lb/gal	VOC % by wt
VERB10114	Black	8.85	33.30%
VERK10113	Cyan	9.05	33.30%
VERR10112	Magenta	8.75	34.30%
VERY10111	Yellow	8.45	37.80%

Non Heatset Inks and Worse Case

Product	Color	Weight lb/gal	VOC % by wt
BCO44-37340	Cyan	9.01	1.12%
BCO44-37344	Magenta	9.34	1.60%
YCO44-39393	Yellow	8.88	1.09%
KCO44-38521	Black	8.71	0.73%

**EP Graphics**  
**Significant Permit Modification**  
**Press 1 (68) emissions- VOC**

Product	Maximum Coverage lb/MMsqin	Density lb/gal	VOC Content wt%	VOC Content lb/gal	Flash Off <sup>1</sup> %	Throughput MMsqin/yr	PTE uncontrolled TPY	Capture Efficiency <sup>2</sup> %	Destruction Efficiency <sup>2</sup> %	PTE Controlled TPY
ink	1.55	8.45	37.8%	3.19	80%	335543	78.64	100%	90%	7.86
fountain Solution	0.13	9.18	22.5%	1.25	100.00%	335543	2.97	70%	90%	1.10
blanket wash	0.09	6.93	99.0%	6.86	100.00%	335543	14.95	70%	90%	5.53

Totals	Uncontrolled PTE	96.6 TPY VOC
	Controlled PTE	14.5 TPY VOC

<sup>1</sup> Assumed flash off of 80% for heatset lithographic printing  
(source OAQPS Draft Guidance, "Control of Volatile Organic Compounds from Offset Lithographic Printing- 9/93)

<sup>2</sup> BACT conditions established for EP Graphics permit 001-23138-00039

EP Graphics  
 Significant Permit Modification  
 Press 1 (68) emissions- HAP

Product	HAP constituent	Maximum Coverage lb/MMscin	Density lb/gal	HAP Content %	HAP Content lb/gal	Flash Off %	Throughput MMscin/yr	PTE uncontrolled TPY	Capture Efficiency <sup>1</sup> %	Destruction Efficiency <sup>1</sup> %	PTE Controlled TPY
Fountain Solution	Propylene Glycol	0.13	9.18	5.50%	0.50	100%	335543	1.20	70%	90%	0.44
Blanket Wash	Xylene	0.09	6.93	2.75%	0.19	100%	335543	0.42	70%	90%	0.15
Blanket Wash	Cumene	0.09	6.93	2.20%	0.15	100%	335543	0.33	70%	90%	0.12
Blanket Wash	1,2,3 Trimethylbenzene	0.09	6.93	14.85%	1.03	100%	335543	2.24	70%	90%	0.83

Totals	Uncontrolled PTE	4.2 TPY HAP
	Controlled PTE	1.6 TPY HAP

<sup>1</sup> BACT conditions established for EP Graphics permit 001-23138-00039

**EP Graphics  
 Significant Permit Modification  
 Press 2 (58) emissions- VOC**

Product	Maximum Coverage lb/MMsqin	Density lb/gal	VOC Content		Flash Off <sup>1</sup> %	Throughput MMsqin/yr	PTE uncontrolled TPY
			wt%	lb/gal			
ink	1.46	9.3	1.6%	0.15	80%	627819	5.87
fountain Solution	0.13	9.18	22.5%	1.25	100%	627819	5.56
blanket wash	0.09	6.93	99.0%	6.86	100%	627819	27.97

<b>Total</b>	<b>Uncontrolled PTE</b>	<b>39.4 TPY VOC</b>
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<sup>1</sup> Assumed flash off of 80% for heatset lithographic printing  
 (source OAQPS Draft Guidance, "Control of Volatile Organic Compounds from Offset Lithographic Printing- 9/93)

EP Graphics  
 Significant Permit Modification  
 Press 2 (58) emissions- HAP

Product	HAP constituent	Maximum Coverage lb/MMscqin	Density lb/gal	HAP Content		Flash Off %	Throughput MMscqin/yr	PTE uncontrolled TPY
				%	lb/gal			
Fountain Solution	Propylene Glycol	0.13	9.18	5.50%	0.50	100%	627819	2.24
Blanket Wash	Xylene	0.09	6.93	2.75%	0.19	100%	627819	0.78
Blanket Wash	Cumene	0.09	6.93	2.20%	0.15	100%	627819	0.62
Blanket Wash	1,2,3 Trimethylbenzene	0.09	6.93	14.85%	1.03	100%	627819	4.20

Total	Uncontrolled PTE	7.84 TPY HAP
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**EP Graphics  
Significant Permit Modification  
Press 3 (69) emissions- VOC**

Product	Maximum Coverage lb/MMsqin	Density lb/gal	VOC Content		Flash Off <sup>1</sup> %	Throughput MMsqin/yr	PTE uncontrolled TPY	Capture Efficiency <sup>2</sup> %	Destruction Efficiency <sup>2</sup> %	PTE Controlled TPY
			wt%	lb/gal						
ink	1.55	8.45	0.378	3.1941	80%	173826	40.74	100%	90%	4.07
fountain Solution	0.13	9.18	0.225	1.25	100%	173826	1.54	70%	90%	0.57
blanket wash	0.09	6.93	0.99	6.8607	100%	173826	7.74	70%	90%	2.87

Totals	Uncontrolled PTE	50.02 TPY VOC
	Controlled PTE	7.51 TPY VOC

<sup>1</sup> Assumed flash off of 80% for heatset lithographic printing  
(source OAQPS Draft Guidance, "Control of Volatile Organic Compounds from Offset Lithographic Printing- 9/93)

<sup>2</sup> BACT conditions established for EP Graphics permit 001-23138-00039

**EP Graphics  
Significant Permit Modification  
Press 3 (69) emissions- HAP**

Product	HAP constituent	Maximum Coverage lb/MMsqin	Density lb/gal	HAP Content %	HAP Content lb/gal	Flash Off %	Throughput MMsqin/yr	PTE uncontrolled TPY	Capture Efficiency <sup>1</sup> %	Destruction Efficiency <sup>1</sup> %	PTE	
											Controlled TPY	Controlled TPY
Fountain Solution	Propylene Glycol	0.13	9.18	5.50%	0.50	100%	173826	0.62	70%	90%	0.23	0.23
Blanket Wash	Xylene	0.09	6.93	2.75%	0.19	100%	173826	0.22	70%	90%	0.08	0.08
Blanket Wash	Cumene	0.09	6.93	2.20%	0.15	100%	173826	0.17	70%	90%	0.06	0.06
Blanket Wash	1,2,3 Trimethylbenz	0.09	6.93	14.85%	1.03	100%	173826	1.16	70%	90%	0.43	0.43

Totals	Uncontrolled PTE	2.17 TPY HAP
	Controlled PTE	0.80 TPY HAP

<sup>1</sup> BACT conditions established for EP Graphics permit 001-23138-00039



**EP Graphics, Inc.  
Significant Permit Revision**

Emission Unit/Process Unit	Uncontrolled PTE of Modification in tons per year									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO <sub>2</sub> e	Combined HAPs	Worst Single HAP
Lithographic Printing Press #68 (heatset)	-	-	-	-	-	87.85	-	-	2.20	1.12 1,2,3 Trimethylbenzene
Lithographic Printing Press #69 (heatset)	-	-	-	-	-	45.51	-	-	1.14	0.58 1,2,3 Trimethylbenzene
Lithographic Printing Press #58 (non heatset)	-	-	-	-	-	20.54	-	-	2.80	2.10 1,2,3 Trimethylbenzene
Natural Gas-fired Dryers #68 and #69	0.03	0.11	0.11	0.01	1.50	0.08	1.26	1,815	0.03	0.03 Hexane
<b>Total New Emission Units</b>	<b>0.03</b>	<b>0.11</b>	<b>0.11</b>	<b>0.01</b>	<b>1.50</b>	<b>153.98</b>	<b>1.26</b>	<b>1,815</b>	<b>6.16</b>	<b>3.80</b> <b>1,2,3</b> <b>Trimethylbenzene</b>

Emission Unit/Process Unit	Controlled PTE in tons per year									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO <sub>2</sub> e	Combined HAPs	Worst Single HAP
Lithographic Printing Press #68 (heatset)	-	-	-	-	-		-	-	2.20	1.12 1,2,3 Trimethylbenzene
Lithographic Printing Press #69 (heatset)	-	-	-	-	-		-	-	1.14	0.58 1,2,3 Trimethylbenzene
Lithographic Printing Press #58 (non heatset)	-	-	-	-	-		-	-	2.80	2.10 1,2,3 Trimethylbenzene
Natural Gas-fired Dryers #68 and #69	0.03	0.11	0.11	0.01	1.50	0.08	1.26	1,815	0.03	0.03 Hexane
<b>Total New Emission Units</b>	<b>0.03</b>	<b>0.11</b>	<b>0.11</b>	<b>0.01</b>	<b>1.50</b>	<b>0.08</b>	<b>1.26</b>	<b>1,815</b>	<b>6.16</b>	<b>3.80</b> <b>1,2,3</b> <b>Trimethylbenzene</b>

**EP Graphics, Inc.  
Significant Permit Revision  
Press 68 VOC Emissions**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
Goss mark 16 (Press 68)	1400	38	335543

INK VOCS					
Ink Name Press Id	Maxium Coverage '(lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/year)
Inks (worst case)	1.55	38%	80.00%	335543	78.64
Fountain Solution	0.076	14%	100.00%	335543	1.73
Blanket Wash	0.045	99%	100.00%	335543	7.47

Total (Uncontrolled) = **87.85**  
Total (Controlled) = **15.39**

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY:**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

**EP Graphics, Inc.  
Significant Permit Revision  
Press 68 HAP Emissions**

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin <sup>2</sup> /Year)
Press #68	1,400	38.0	335,543

	Maxium Coverage (lbs/MMin <sup>2</sup> )	* Weight % HAP	Flash Off %	PTE of HAP (tons/year)
Fountain Solution (Propylene Glycol)	0.08	5.5%	100%	0.70
Blanket Wash (Xylene)	0.05	2.8%	100%	0.21
Blanket Wash (Cumene)	0.05	2.2%	100%	0.17
Blanket Wash (1,2,3 Trimethylbenzene)	0.05	14.9%	100%	1.12

**Total                    2.20**

**METHODOLOGY**

Max. Throughput (MMin<sup>2</sup>/year) = Maximum line speed (feet/minute) \* 12 inches/feet \* Maximum print width (inches) \* 60 minutes/ hour \* 8760 hours/year

PTE of VOC (tons/year) = Maximum coverage (lbs/MMin<sup>2</sup>) \* Weight % volatiles \* Flash off % \* Max. throughput (MMin<sup>2</sup>/year) \* 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.

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

EP Graphics, Inc.  
 Significant Permit Revision  
 Press 69 VOC Emissions

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
Goss mark 16 (Press 68)	1378	20	173826

INK VOCS					
Ink Name Press Id	Maxium Coverage '(lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)
Inks (worst case)	1.55	38%	80.00%	173826	40.74
Fountain Solution	0.076	14%	100.00%	173826	0.90
Blanket Wash	0.045	99%	100.00%	173826	3.87

Total (Uncontrolled) = 45.51  
 Total (Controlled) = 7.97

VOC emissions are controlled by a thermal oxidizer with a 90% control efficiency.

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

**METHODOLOGY:**

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

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

**EP Graphics, Inc.  
Significant Permit Revision  
Press 69 HAP Emissions**

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin <sup>2</sup> /Year)
Press #69	1,378	20.0	173,826

	Maxium Coverage (lbs/MMin <sup>2</sup> )	* Weight % HAP	Flash Off %	PTE of HAP (tons/year)
Fountain Solution (Propylene Glycol)	0.08	5.5%	100%	0.36
Blanket Wash (Xylene)	0.05	2.8%	100%	0.11
Blanket Wash (Cumene)	0.05	2.2%	100%	0.09
Blanket Wash (1,2,3 Trimethylbenzene)	0.05	14.9%	100%	0.58

**Total            1.14**

**METHODOLOGY**

Max. Throughput (MMin<sup>2</sup>/year) = Maximum line speed (feet/minute) \* 12 inches/feet \* Maximum print width (inches) \* 60 minutes/ hour \* 8760 hours/year

PTE of VOC (tons/year) = Maximum coverage (lbs/MMin<sup>2</sup>) \* Weight % volatiles \* Flash off % \* Max. throughput (MMin<sup>2</sup>/year) \* 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.

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

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin <sup>2</sup> /Year)
Lithographic Printing Press #58	2,844	35.0	627,819

Ink Name	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
Ink	1.46	1.60%	80%	5.87
Fountain Solution	0.03	6.50%	100%	0.69
Blanket Wash	0.05	99.00%	100%	13.98
<b>Total</b>				<b>20.54</b>

#### METHODOLOGY

Max. Throughput (MMin<sup>2</sup>/year) = Maximum line speed (feet/minute) \* 12 inches/feet \* Maximum print width (inches) \* 60 minutes/ hour \* 8760 hours/year

PTE of VOC (tons/year) = Maximum coverage (lbs/MMin<sup>2</sup>) \* Weight % volatiles \* Flash off % \* Max. throughput (MMin<sup>2</sup>/year) \* 1 ton/ 2000 lbs

Note: Heat set and non heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.

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

**EP Graphics, Inc.  
Significant Permit Revision  
Press 58 HAP Emissions**

Unit	Max.Line Speed (feet/minute)	Max. Print Width (inches)	Potential Throughput (MMin <sup>2</sup> /Year)
Press #58	2,844	35.0	627,819

	Maxium Coverage (lbs/MMin <sup>2</sup> )	* Weight % HAP	Flash Off %	PTE of HAP (tons/year)
Blanket Wash (Xylene)	0.05	2.8%	100%	0.39
Blanket Wash (Cumene)	0.05	2.2%	100%	0.31
Blanket Wash (1,2,3 Trimethylbenzene)	0.05	14.9%	100%	2.10

**Total            2.80**

**METHODOLOGY**

Max. Throughput (MMin<sup>2</sup>/year) = Maximum line speed (feet/minute) \* 12 inches/feet \* Maximum print width (inches) \* 60 minutes/ hour \* 8760 hours/year  
PTE of VOC (tons/year) = Maximum coverage (lbs/MMin<sup>2</sup>) \* Weight % volatiles \* Flash off % \* Max. throughput (MMin<sup>2</sup>/year) \* 1 ton/ 2000 lbs

Note: Heat set offset printing has an assumed flash off of 80%. Other type of printing presses have a flash off of 100 %.  
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

**EP Graphics, Inc.  
Significant Permit Revision  
Dryer #68 and Dryer #69**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.5	1020	30.1

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 t	0.0	0.1	0.1	0.0	1.5	0.1	1.3

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combine  
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 recircul

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Bt

MMCF = 1,000,000 Cubic Feet of

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020

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

**HAPS Calculations**

Emission Factor in lb/l	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 t	3.156E-05	1.804E-05	1.127E-03	2.705E-02	5.110E-05	<b>2.828E-02</b>

Emission Factor in lb/l	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 t	7.515E-06	1.653E-05	2.104E-05	5.711E-06	3.156E-05	<b>8.236E-05</b>
						<b>Total HAPs 2.836E-02</b>
						<b>Worst HAP 2.705E-02</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter

**Greenhouse Gas Calculations**

Emission Factor in lb/l	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in t	1,804	0.0	0.0
Summed Potential Emissions in tons/yr	1,804		
CO2e Total in tons/yr	1,815		

**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 1-03-006-02.

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

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

<b>Interim Petition Checklist</b>	
<b>Instructions:</b> (a) Please answer yes or no. (b) Enclosed this checklist with the completed interim petition package.	
<b>Company Name:</b>	
<b>Location:</b>	
yes	1. Is the written interim petition prepared?
yes	2. Is the written petition signed and dated?
yes	3. Is the public notice drafted?
yes	4. Is the filing and review fee enclosed? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
yes	5. Is the account number written on the check or money order?
yes	6. Is the Affidavit of Construction signed, dated, and notarized?
yes	7. Is the proposed modification/revision described in detail?
yes	8. Is the proposed modification/revision a modification or addition to an existing source?
yes	9. Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
no	10. Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
	11. Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
yes	12. Are potential emissions calculated?
yes	13. Is federal enforceability consent specifically indicated?
yes	14. Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
no	15. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
yes	16. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
yes	17. Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
yes	18. Has a regular modification/revision permit application been submitted to OAQ?
no	19. Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
yes	20. The interim petition comment period has been decided to be: <b>14 calendar days</b>
<b>Additional Comments:</b> Signed public notice to be submitted within five days.	

RECEIVED  
State of Indiana

APR 12 2013 -le

Dept of Environmental Management  
Office of Air Quality

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION

**Source Name:** EP Graphics. Inc.

**Source Address:** 169 S Jefferson St., Berne, IN 46711

**Mailing Address:** 169 S Jefferson St., Berne, IN 46711

**SIC/NAICS Code:** 2752

**Description of the Operation or Equipment:**

In February of 2013, EP Graphics purchased Mignone Communications, INC (permit number 069-28860-00059) located in Huntington, IN. EP Graphics is moving three lithographic presses (two heatset and one non heatset) and two natural gas fired dryers associated with the two heatset lithographic presses from the Huntington facility to EP Graphics in Berne. EP Graphics is submitting an application for a significant permit modification for these changes. EP graphics plans to use the existing control equipment (RTO) located at the Berne facility to treat the exhaust stream from the dryers from the two relocated heatset presses as well as the existing dryers. Installation of the relocated presses will begin on May 1. Startup of the relocated presses is scheduled for June 15, 2013.

**Potential to Emit:**

EP Graphics  
Significant Permit Modification  
Uncontrolled Emissions

	PM	PM10	SO2	NOx	VOC	CO
	TPY	TPY	TPY	TPY	TPY	TPY
Press 1 (68)	0	0	0	0	96.6	0
Press 3 (69)	0	0	0	0	50.02	0
Press 2 (58)	0	0	0	0	39.4	0
Dryers	0.03	0.118	0.009	1.55	0.09	1.3
	0.03	0.118	0.009	1.55	186.11	1.3

Combined HAPS- 14.2 TPY

Max Individual HAP- (1,2,3 Trimethylbenzene)- 7.6 TPY

**EP Graphics  
Significant Permit Modification  
Controlled Emissions**

	PM	PM10	SO2	NOx	VOC	CO
	TPY	TPY	TPY	TPY	TPY	TPY
Press 1 (68)	0	0	0	0	14.5	0
Press 3 (69)	0	0	0	0	7.51	0
Press 2 (58)	0	0	0	0	39.4	0
Dryers	0.03	0.118	0.009	1.55	0.09	1.3
total	0.03	0.118	0.009	1.55	61.5	1.3

Combined HAPS- 10.18

Max Individual HAP- (1,2,3 Trimethylbenzene)- 5.46 TPY

**PSD Requirements:**

The potential to emit is less than the PSD Significance levels, therefore, PSD rules do not apply.

**NSPS Requirements:**

There is no NSPS rule applicable to this operation or equipment.

**NESHAP Requirements:**

There is no NESHAP rule applicable to this operation or equipment.

**State Rules & Requirements:**

**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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

### **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

This rule requires that the source 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).

### **326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP)) and 326 IAC 2-7 (Part 70 Permit)**

The source will either:

- (1) Maintain emission levels below 100 TPY per twelve (12) consecutive month period. Emission limits will be attained by limiting VOC emissions as described in 326 IAC 8-1-6. Or
- (2) Operate as a minor HAP facility under 326 IAC 2-7

EP Graphics will maintain a minor HAP status by limiting any single HAP to less than 10 TPY and any combination of HAPS to less than 25 TPY using technology described in 326 IAC 8-1-6

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

All three lithographic presses scheduled for installation have VOC PTE greater the 25 TPY and are subject to 326 IAC 8-1-6. BACT requirements for existing lithographic facilities at Berne are:

For heat set presses (68 and 69) using a regenerative thermal oxidizer (identified as RTO-1) for VOC control, the VOC emissions shall be determined after the effect of the regenerative thermal oxidizer. To determine the VOC input to the regenerative thermal oxidizer, the Permittee shall be allowed a VOC retention factor of 20% for the heatset inks. The capture efficiency shall comply with the following:

1. One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and
2. Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

The dryers shall be operated at a negative pressure and demonstration of negative pressure shall be demonstrated using a manometer

The RTO will be in operation at all times that the heatset presses (68 and 69) are in operation.

The RTO will maintain a minimum temperature of 1400 deg F and shall achieve a minimum destruction efficiency of 90%

### **326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 8-1-2 (VOC- Compliance Methods)**

EP Graphics may choose to comply with 326 IAC 8-2-5 using 326 IAC 8-1-2 as a compliance method. If permit negotiations result in these rules being applicable, then 326 IAC 8-1-6 will not apply. EP Graphics will apply the same technology described in 326 IAC 8-1-6, with the difference being the methodology used to determine compliance.

In addition, the VOC capture system and VOC control system will be subject to 8-1-2.

**326 IAC 2-8-5 and 2-1.1-11 Testing Requirements**

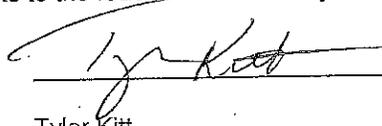
EP Graphics will test the inlet and outlet of the RTO within 180 days of the date of installation to determine compliance with either 326 IAC 8-2-5 or 8-1-6

**326 IAC 2-8-4 Compliance determination requirements**

EP Graphics will be subject to compliance determination requirements

**Federal Enforceability:**

The company consents to the federal enforceability of this interim petition.

Signature:   
Printed Name: Tyler Kitt  
Title or Position: President  
Phone Number: 260-589-2145  
Date: 4/5/13

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision/Significant Source Modification  
for **EP Graphics, Inc.**  
in **Adams County**

Notice is hereby given that the above company located at 169 Jefferson St, Berne , Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct three Lithographic Printing Presses with its existing Regenerative Thermal Oxidizer as air pollution control. Based on 8,760 hours per year of operation, the VOC emissions are 61.5 tons per year, respectively *after controls*.

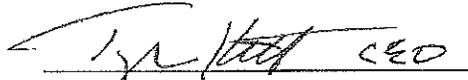
The company has submitted an application for a significant permit revision / significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Berne Public Library, 166 N. Sprunger St, Berne, IN 46711**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:



Company Official's Printed Name:

Tyler Kitt

Company Name:

EP Graphics, INC

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION

**Source Name:** EP Graphics. Inc.

**Source Address:** 169 S Jefferson St., Berne, IN 46711

**Mailing Address:** 169 S Jefferson St., Berne, IN 46711

**SIC/NAICS Code:** 2752

**Description of the Operation or Equipment:**

In February of 2013, EP Graphics purchased Mignone Communications, INC (permit number 069-28860-00059) located in Huntington, IN. EP Graphics is moving three lithographic presses (two heatset and one non heatset) and two natural gas fired dryers associated with the two heatset lithographic presses from the Huntington facility to EP Graphics in Berne. EP Graphics is submitting an application for a significant permit modification for these changes. EP graphics plans to use the existing control equipment (RTO) located at the Berne facility to treat the exhaust stream from the dryers from the two relocated heatset presses as well as the existing dryers. Installation of the relocated presses will begin on May 1. Startup of the relocated presses is scheduled for June 15, 2013.

**Potential to Emit:**

**EP Graphics  
Significant Permit Modification  
Uncontrolled Emissions**

Emission Unit/Process Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO
Lithographic Printing Press #68 (heatset)	-	-	-	-	-	87.85	-
Lithographic Printing Press #69 (heatset)	-	-	-	-	-	45.51	-
Lithographic Printing Press #58 (non heatset)	-	-	-	-	-	20.54	-
Natural Gas-fired Dryers #68 and #69	0.03	0.11	0.11	0.01	1.50	0.08	1.26
<b>Total New Emission Units</b>	<b>0.03</b>	<b>0.11</b>	<b>0.11</b>	<b>0.01</b>	<b>1.50</b>	<b>153.98</b>	<b>1.26</b>

Combined HAPs- 6.16 TPY

Maximum single HAP- 3.80 TPY 1,2,3 Trimethlybenzene

**EP Graphics  
Significant Permit Modification  
Limited Emissions for  
Source**

Emission Unit/Process Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO <sub>2</sub> e
King Process Color Press #67	-	-	-	-	-	77.55		
Lithographic Printing Press #66	-	-	-	-	-			
RTO	0.01	0.03	0.03	0.00	0.39		0.33	472
Natural Gas-fired Dryers #66 and #67	-	-	-	-	-			
Lithographic Printing Press #68 (heatset)	-	-	-	-	-			
Lithographic Printing Press #69 (heatset)	-	-	-	-	-			
Natural Gas-fired Dryers #68 and #69	0.03	0.11	0.11	0.01	1.50		1.26	1,815
Lithographic Printing Press #58 (non heatset)	-	-	-	-	-	20.54	-	
Solvent Usage (Cleaning)	-	-	-	-	-	-	-	-
Seven Ink Jet Printers	-	-	-	-	-	0.76	-	-
Natural Gas Forced Air Heaters	0.05	0.21	0.21	0.02	2.74	0.15	2.30	3,308
<b>Total Limited Emission</b>	<b>0.20</b>	<b>0.66</b>	<b>0.66</b>	<b>0.05</b>	<b>8.07</b>	<b>99.00</b>	<b>6.78</b>	<b>9,741</b>

Combined HAPS- 6.16 TPY

Maximum Single HAP- 3.80 TPY 1,2,3 Trimethlybenzene

**PSD Requirements:**

The potential to emit is less than the PSD threshold limits of 250 tons per year, therefore, PSD rules do not apply.

**NSPS Requirements:**

There is no NSPS rule applicable to this operation or equipment.

**NESHAP Requirements:**

There is no NESHAP rule applicable to this operation or equipment.

## **State Rules & Requirements:**

### **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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

### **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

This rule requires that the source 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).

### **326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP)) and**

### **326 IAC 2-7 (Part 70 Permit)**

The source will either:

- (1) Maintain emission levels below 100 TPY per twelve (12) consecutive month period. Emission limits will be attained by limiting VOC emissions as described in 326 IAC 8-1-6. Or
- (2) Operate as a minor HAP facility under 326 IAC 2-7

EP Graphics will maintain a minor HAP status by limiting any single HAP to less than 10 TPY and any combination of HAPS to less than 25 TPY using technology described in 326 IAC 8-1-6.

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

Presses 68 and 69 have VOC PTE greater the 25 TPY and are subject to 326 IAC 8-1-6. BACT requirements for existing lithographic facilities at Berne are:

For heat set presses (68 and 69) using a regenerative thermal oxidizer (identified as RTO-1) for VOC control, the VOC emissions shall be determined after the effect of the regenerative thermal oxidizer. To determine the VOC input to the regenerative thermal oxidizer, the Permittee shall be allowed a VOC retention factor of 20% for the heatset inks. The capture efficiency shall comply with the following:

1. One hundred percent (100%) capture of the VOCs emitted by the heatset inks, not retained by the substrate; and
2. Seventy percent (70%) capture of the VOCs emitted from alcohol substitution in the fountain solutions.

The dryers shall be operated at a negative pressure and demonstration of negative pressure shall be demonstrated using a manometer

The RTO will be in operation at all times that the heatset presses (68 and 69) are in operation.

The RTO will maintain a minimum temperature of 1400 deg F and shall achieve a minimum destruction efficiency of 90%

EP Graphics has submitted a application for BACT determination for the two presses subject to BACT and is prepared to apply the above control technology to presses 68 and 69.

**326 IAC 2-8-5 and 2-1.1-11 Testing Requirements**

EP Graphics will test the inlet and outlet of the RTO within 180 days of the date of installation to determine compliance with either 326 IAC 8-2-5 or 8-1-6

**326 IAC 8-1-6 Compliance determination requirements**

EP Graphics will be subject to compliance determination requirements

**Federal Enforceability:**

The company consents to the federal enforceability of this interim petition.

Signature:   
Printed Name: Tyler N. Kitt  
Title or Position: CEO  
Phone Number: 260-589-2145  
Date: 5/7/13

### Affidavit of Construction

I, Tyler Kitt, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in Wells 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 President for EP Graphics, Inc.  
(Title) (Company Name)

3. By virtue of my position with EP Graphics, I have personal  
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make

these representations on behalf of EP Graphics  
(Company Name)

4. I, the undersigned, have submitted an interim (minor permit revision, significant permit revision, minor source modification, significant source modification) petition to the Office of Air Quality for the construction of two heatset lithograph presses with ovens and one air dry lithograph press.

5. EP Graphics recognizes the following risks:  
(Company Name)

- (a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and
- (d) any additional air permitting requirements.

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: Tyler Kitt  
PRES

Printed Name: Tyler Kitt

Phone No.: 260-589-2145

Date: 4/5/13

STATE OF INDIANA)

)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for Adams, Indiana

County and State of Indiana on this 5<sup>th</sup> day of April

, 20 12

My Commission expires: August 27, 2015

Signature: Rachel Summers

Printed Name: Rachel Summers

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision/Significant  
Source Modification for **EP Graphics, Inc.** in **Adams County**

Notice is hereby given that the above company located at 169 Jefferson St, Berne, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct three Lithographic Printing Presses with its existing Regenerative Thermal Oxidizer as air pollution control. Based on 8,760 hours per year of operation, the VOC emissions are 61.5 tons per year, respectively, *after controls*.

The company has submitted an application for a significant permit revision/significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Berne Public Library, 166 N. Sprunger St, Berne, IN 46711**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Tyler Kitt  
EP Graphics, INC

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hspaxlp



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

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

TO: Ann Kesler  
EP Graphics, Inc  
169 S Jefferson Street  
Berne, IN 46711

DATE: May 10, 2013

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

SUBJECT: Final Decision  
Interim  
001-33085i-00039

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:  
Donald L Taylor – Bruce Carter Associates  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 5/10/2013 EP Graphics, Inc 001-33085i-00039 final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Ann Kesler EP Graphics, Inc 169 S Jefferson St Berne IN 46711 (Source CAATS) via confirmed delivery										
2		Luther & Phyllis Burry 256 E Main Berne IN 46711 (Affected Party)										
3		Ms. Kay Mae Ellenberger 266 Hilty Berne IN 46711 (Affected Party)										
4		Mr. Robert McKinley 114 Ban Buren St Berne IN 46711 (Affected Party)										
5		Mr. Ron Claghorn 104 Van Buren Berne IN 46711 (Affected Party)										
6		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local Official)										
7		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 (Health Department)										
8		Berne City Council and Mayors Office 158 W. Franklin St. Berne IN 46711 (Local Official)										
9		Donald L Taylor Bruce Carter Associates 616 S 4th Street Elkhart IN 46514 (Consultant)										
10												
11												
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13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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