



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: August 15, 2013

RE: USPS Indianapolis Processing & Distribution Center / 097 - 33332 - 00715

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

Notice of Decision: Approval - Registration

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

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

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

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

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

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

Enclosures
FN-REGIS.dot 6/13/2013



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

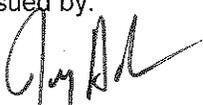
Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

**REGISTRATION
OFFICE OF AIR QUALITY**

**United States Postal Service
Indianapolis Processing & Distribution Center
125 West South Street
Indianapolis, Indiana 46206-9997**

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

Registration No. R097-33332-00715	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 15, 2013

SECTION A

SOURCE SUMMARY

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

A.1 General Information

The Registrant owns and operates a stationary mail processing and distribution facility.

Source Address:	125 W. South St, Indianapolis, Indiana 46206-9741
General Source Phone Number:	(317) 464-6510
SIC Code:	4311
County Location:	Marion County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) Cleaver Brooks natural gas fired boilers, identified as 001 and 002, constructed in 1969, with a maximum capacity of 10.461 MMBtu/hr each, and exhausting outside the building.
- (b) One (1) Weil-McLain natural gas fired boiler, identified as 003, constructed in 1994, with a maximum capacity of 2.049 MMBtu/hr, and exhausting outside the building.
- (c) One (1) Lochinvar natural gas fired water heater, identified as 004, constructed in 1986, with a maximum capacity of 0.40 MMBtu/hr, and exhausting outside the building.
- (d) Seven (7) Ambirad natural gas fired infrared heaters, identified as emissions unit 005, constructed in 2006, with a maximum capacity of 0.140 MMBtu/hr each, and exhausting outside the building.
- (e) Two (2) Bioforce Model BE-15 solvent degreasing tanks, identified as emissions unit 006, constructed after July 1, 1990, with a maximum capacity of 25 gallons each, and exhausting indoors.
- (f) Nine (9) inkjet printing systems used to process mail, constructed after January 1, 1980, identified as emissions unit 007, and exhausting indoors.
- (g) Fugitive dust emissions from vehicle traffic on paved roadways.

SECTION B

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to Registration No. 097-33332-00715 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

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

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

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

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

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

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

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

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

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

The Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

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

Record Keeping and Reporting Requirements [326 IAC 2-5.5-4(b)]

C.3 General Record Keeping Requirements [326 IAC 2-5.5-4(b)]

- (a) Records of all required monitoring data, reports and support information required by this registration 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 Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

SECTION D.1

OPERATION CONDITIONS

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

- (a) Two (2) Cleaver Brooks natural gas fired boilers, identified as 001 and 002, constructed in 1969, with a maximum capacity of 10.461 MMBtu/hr each, and exhausting outside the building.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emissions Limitations for Sources of Indirect Heating), the PM emissions from each boiler (001 and 002) shall be limited to 0.53 pounds per MMBtu heat input.

SECTION D.2

OPERATION CONDITIONS

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

- (b) One (1) Weil-McLain natural gas fired boiler, identified as 003, constructed in 1994, with a maximum capacity of 2.049 MMBtu/hr, and exhausting outside the building.
- (c) One (1) Lochinvar natural gas fired water heater, identified as 004, constructed in 1986, with a maximum capacity of 0.40 MMBtu/hr, and exhausting outside the building.
- (d) Seven (7) Ambirad natural gas fired infrared heaters, identified as emissions unit 005, installed in 2006, with a maximum capacity of 0.140 MMBtu/hr each, and exhausting outside the building.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.2.1 Particulate Emissions Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), PM emissions shall be limited to Pt pounds per MMBtu heat input as follows::

Emission Units	ID	Pt (lb/MMBtu)
Weil-McLain boiler	003	0.48
Lochinvar water heater	004	0.49
Ambirad infrared heaters	005 (collectively)	0.48 (each)

SECTION D.3

OPERATION CONDITIONS

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

- (e) Two (2) Bioforce Model BE-15 solvent degreasing tanks, identified as emissions unit 006, installed after July 1, 1990, with a maximum capacity of 25 gallons each, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

D.3.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-2][326 IAC 8-3-8]

- (a) Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (1) Equip the degreaser with a cover.
- (2) Equip the degreaser with a device for draining cleaned parts.
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases
- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

- (b) Pursuant to 326 IAC 8-3-2(b) (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaner degreaser operations without remote solvent reservoirs, the Permittee shall ensure that the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as

those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated
- (3) If used, solvent spray:
 - (A) Must be a solid fluid stream; and
 - (B) Shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 15, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Recordkeeping and Reporting [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

D.3.3 Record Keeping Requirements [326 IAC 8-3-8]

- (a) On and after January 15, 2015, in order to document the compliance status with Condition D.3.2, the Permittee shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

Company Name:	United States Postal Service, Indianapolis Processing & Distribution Center
Address:	125 W. South St
City:	Indianapolis, Indiana 46206-9741
Phone Number:	(317) 464-6510
Registration No.:	097-33332-00715

I hereby certify that USPS Indianapolis P&DC is :

still in operation.

no longer in operation.

I hereby certify that USPS Indianapolis P&DC is :

in compliance with the requirements of Registration No. 097-33332-00715.

not in compliance with the requirements of Registration No. 097-33332-00715.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	USPS Indianapolis Processing & Distribution Center
Source Location:	125 W. South St., Indianapolis, IN 46206-9741
County:	Marion
SIC Code:	4311
Registration No.:	R097-33332-00715
Permit Reviewer:	Douglas Logan, P.E.

On June 20, 2013, the Office of Air Quality (OAQ) received an application from the United States Postal Service related to the operation of an existing Processing & Distribution Center.

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. Unclassifiable or attainment effective federally July 11, 2013, 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 attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
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

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by the United States Postal Service Indianapolis Processing & Distribution Center on June 20, 2013, relating to the registration of a mail processing and distribution center.

The source consists of the following existing emission units:

- (a) Two (2) Cleaver Brooks natural gas fired boilers, identified as 001 and 002, constructed in 1969, with a maximum capacity of 10.461 MMBtu/hr each, and exhausting outside the building.
- (b) One (1) Weil-McLain natural gas fired boiler, identified as 003, constructed in 1994, with a maximum capacity of 2.049 MMBtu/hr, and exhausting outside the building.
- (c) One (1) Lochinvar natural gas fired water heater, identified as 004, constructed in 1986, with a maximum capacity of 0.40 MMBtu/hr, and exhausting outside the building.
- (d) Seven (7) Ambirad natural gas fired infrared heaters, identified as emissions unit 005, constructed in 2006, with a maximum capacity of 0.140 MMBtu/hr each, and exhausting outside the building.
- (e) Two (2) Bioforce Model BE-15 solvent degreasing tanks, identified as emissions unit 006, constructed after July 1, 1990, with a maximum capacity of 25 gallons each, and exhausting indoors.
- (f) Nine (9) inkjet printing systems used to process mail, constructed after January 1, 1980, identified as emissions unit 007, and exhausting indoors.
- (g) Fugitive dust emissions from vehicle traffic on paved roadways.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Boilers	0.19	0.76	0.76	0.06	10.04	0.552	8.43	12,116	0.19	0.18 (hexane)
IR Heaters	0.01	0.03	0.03	0.00	0.40	0.023	0.17	508	0.01	0.01 (hexane)
Degreasing	--	--	--	--	--	0.016	--	--	0	0
Printing	0.29	0.29	0.29	--	--	0.221	--	--	0.24	0.121 (ethylene glycol)
Fugitive dust from travel on paved surfaces	1.46	0.29	0.07	--	--	--	--	--	--	--
Total PTE of Entire Source	1.95	1.37	1.15	0.06	10.43	0.812	8.60	12,624	0.43	0.19 (hexane)
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of NO_x is within the range listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration 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.

Federal Rule Applicability Determination
--

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the registration, since boilers 001 and 002 were constructed in 1969, before the applicability date of the NSPS and the heat input rating of boiler 003 is less than the threshold of the NSPS.
- (b) 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD (326 IAC 20-95), are not included in the registration, because this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ, are not included in the registration, because the boilers at the source are gas-fired boilers. Pursuant to 40 CFR 63.11195(e), gas-fired boilers are not subject to Subpart JJJJJJ.
- (e) 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)

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

State Rule Applicability Determination
--

The following state rules are applicable to the source:

- (a) 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.
- (b) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (c) 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 Permit Program), 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.

(d) 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.

(e) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating), particulate emissions from the combustion of fuel for indirect heating shall be limited as shown in (1) and (2):

- (1) Particulate emissions from boilers 001 and 002, which were existing and in operation prior to September 21, 1983 shall be limited as specified in 326 IAC 6-2-2(a):

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where Pt = Pounds of particulate matter emitted per million Btu heat input, lb/MMBtu
Q = Total operating capacity of the emission unit, MMBtu/hr

Compliance calculation:

$$Pt = 0.87 / (20.922)^{0.16} = 0.53 \text{ lb/MMBtu}$$

Potential-to-emit: 7.6 lb PM/MMCF x (1 MMCF/1020 MMBtu) = 0.0074 lb/MMBtu
(source AP-42, 5th ed., Table 1.4-1)

Potential-to-emit is less than the allowable emissions under 326 IAC 6-2-2(a)

- (2) Particulate emissions from boiler 003, water heater 004, and infrared space heaters (emission unit 005) shall be limited as specified in 326 IAC 6-2-4 to the lesser of 0.6 lb/MMBtu or the value calculated from the formula in 326 IAC 6-2-4(a):

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu heat input, lb/MMBtu
Q = Total operating capacity of the source at the time of construction of each facility after September 21, 1983, MMBtu/hr

Particulate emission limitations for indirect heating units installed after September 21, 1983 are shown in the following table:

Particulate Emission Limitations for Indirect Heating Facilities				
Facility	Construction Date	Rated Heat Input Capacity, Q, MMBtu/hr	Particulate Limitation, Pt, lb/MMBtu	Status
Water heater 004	1986	0.4	0.49	operating
Boiler 003	1994	2.049	0.48	operating
IR heaters 005	2006	0.98	0.48	operating

Compliance calculation:

Potential-to-emit: $7.6 \text{ lb PM/MMCF} \times (1 \text{ MMCF}/1020 \text{ MMBtu}) = 0.0074 \text{ lb/MMBtu}$
 (source AP-42, 5th ed., Table 1.4-1)

Potential-to-emit for each unit is less than the allowable emissions under 326 IAC 6-2-4(a)

- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-2(d)(4), processes that use less than 5 gallons of coating per day are exempted from 326 IAC 6-2-3(d). The source used 1.26 gallons of coating per day in 2011 and potential coating usage at maximum operating capacity is 3.1 gallons of coating per day. Therefore the source is exempt from 326 IAC 6-3-2.
- (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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than or equal to 25 tons per year.
- (i) 326 IAC 6-6.5 (Particulate Matter Limitations Except Lake County)
 The source is not subject to the requirements of 326 IAC 6-6.5, because the source is not specifically listed in 326 IAC 6-6.5-6, does not have the potential to emit 100 tons of particulate matter per year, and does not have actual emissions of 10 tons or more per year of particulate matter.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Emission units at this source are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential to emit from each emission unit is less than twenty-five (25) tons per year.
- (k) 326 IAC 8-2 (VOC Rules: Surface Coating Emission Limitations)
 Emission units at this source are not subject to the requirements of 326 IAC 8-2-5 because the mail processing operations are not web coating or saturation processes.
- (l) 326 IAC 8-3 (VOC Rules: Organic Solvent Degreasing Operations)
 The two Bioforce Model BE-15 cold cleaner degreaser tanks are subject to 326 IAC 8-3-2(a) and (b) because the source cannot demonstrate that the units were in operation before July 1, 1990.

On and after January 1, 2015, the degreasers shall be subject to the requirements of 326 IAC 8-3-8(b)(2), (c)(2), and (d).

- (m) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (n) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

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 June 20, 2013.

The operation of this source shall be subject to the conditions of the attached Registration No. R097-33332-00715. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Doug Logan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.
- (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 Sheet**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Uncontrolled Potential to Emit (US tons/yr)											
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NOx	CO _{2e}	Single HAP ID	Single HAP	Total HAP
Emission Unit											
Boilers	0.19	0.76	0.76	0.06	0.552	8.43	10.04	12,116	hexane	0.181	0.189
IR Heaters	0.01	0.03	0.03	0.00	0.023	0.17	0.40	508	hexane	0.008	0.008
Printing	0.29	0.29	0.29	--	0.221	--	--	--	ethylene glycol	0.121	0.236
Degreasing	--	--	--	--	0.016	--	--	--		0	0
Fugitive dust from travel on paved	1.46	0.29	0.07	--	--	--	--	--		--	--
Total Emissions	1.95	1.37	1.15	0.06	0.812	8.60	10.43	12,624	hexane	0.19	0.43

Potential to Emit After Issuance of this Permit (US tons/yr)											
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NOx	CO _{2e}	Single HAP ID	Single HAP	Total HAP
Emission Unit											
Boilers	0.19	0.76	0.76	0.06	0.552	8.43	10.04	12,116	hexane	0.181	0.189
IR Heaters	0.01	0.03	0.03	0.00	0.023	0.17	0.40	508	hexane	0.008	0.008
Printing	0.29	0.29	0.29	--	0.221	--	--	--	ethylene glycol	0.121	0.236
Degreasing	--	--	--	--	0.016	--	--	--		0	0
Fugitive dust from travel on paved	1.46	0.29	0.07	--	--	--	--	--		--	--
Total Emissions	1.95	1.37	1.15	0.06	0.81	8.60	10.43	12,624	hexane	0.19	0.43

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

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Natural gas combustion sources with heat input ratings less than 100 MMBtu/hr, including
 Two (2) Cleaver Brooks boilers, identified as 001 and 002, installed in 1969 with a maximum heat input rate of 10.461 million Btu per hour (MMBtu/hr) each
 One (1) Weil-McLain boiler, identified as 003, installed in 1994, with a maximum heat input rate of 2.049 MMBtu/hr
 One (1) Lochinvar water heater, identified as 004, installed in 1986, with a maximum heat input rate of 0.4 MMBtu/hr

Heat Input Capacity MMBtu/hr	HHV MMBtu MMCF	Potential Throughput MMCF/yr
23.4	1020	200.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO 84
Potential Emission in US tons/yr	0.19	0.76	0.76	0.06	10.04	0.55	8.43

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

HAPS Calculations

Emission Factor in lb/MMCF	HAPs - Organics					Total - Organics
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in US tons/yr	2.108E-04	1.204E-04	7.527E-03	1.806E-01	3.412E-04	0.189

Emission Factor in lb/MMCF	HAPs - Metals					Total - Metals
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in US tons/yr	5.018E-05	1.104E-04	1.405E-04	3.814E-05	2.108E-04	5.500E-04
	Total HAPs					0.189
	Worst HAP					0.181

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 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMCF	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in US tons/yr	12,043	0.2	0.2
Summed Potential Emissions in US tons/yr	12,043		
CO2e Total in US tons/yr	12,116		

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 (US tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / (2,000 lb/US ton)
 CO2e (US tons/yr) = CO2 Potential Emission (US tons/yr) x CO2 GWP (1) + CH4 Potential Emission (US tons/yr) x CH4 GWP (21)
 + N2O Potential Emission (US tons/yr) x N2O GWP (310).

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <0.3**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Natural gas combustion sources with heat input ratings less than 100 MMBtu/hr, including Seven (7) Ambirad infrared space heaters, identified 005, installed in 2006, with a maximum heat input rate of 0.14 MMBtu/hr each

Heat Input Capacity MMBtu/hr	HHV MMBtu MMCF	Potential Throughput MMCF/yr
0.98	1020	8.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	94	5.5	40
Potential Emission in US tons/yr	0.01	0.03	0.03	0.00	0.40	0.02	0.17

*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.

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 (US tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / (2,000 lb/US 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 US tons/yr	8.837E-06	5.050E-06	3.156E-04	7.575E-03	1.431E-05	7.919E-03

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 US tons/yr	2.104E-06	4.629E-06	5.892E-06	1.599E-06	8.837E-06	2.306E-05

Total HAPs	7.942E-03
Worst HAP	7.575E-03

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 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMCF	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in US tons/yr	505	0.0	0.0
Summed Potential Emissions in US tons/yr	505		
CO2e Total in US tons/yr	508		

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 (US tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / (2,000 lb/US ton)
CO2e (US tons/yr) = CO2 Potential Emission (US tons/yr) x CO2 GWP (1) + CH4 Potential Emission (US tons/yr) x CH4 GWP (21)
+ N2O Potential Emission (US tons/yr) x N2O GWP (310).

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

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 41492

Nine (9) printing machines using black and fluorescent orange ink for postage cancellation.

THROUGHPUT		
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)
NA	NA	NA

INK VOCS					
Ink Name	Capacity (ga/yr)	Weight % VOC	Ink Density (lb/gal)	Emissions (100% Capacity)	
				(lb/hr)	(US ton/yr)
<u>Black Inks (Interchangable)</u>					
VJ Black Ink 16-5000QP	281.75	14%	8.59	0.039	0.169
VJ Black Cancellations Ink 20-S2500LP	281.75	0%	8.67	0.000	0.000
Imaje Black Ink 9702	281.75	12%	8.84	0.035	0.154
Imaje Additive 8701	281.75	0%	8.34	0	0
Kodak Black Ink 1000	281.75	1%	8.49	0.003	0.012
Kodak Replenisher	281.75	1%	8.34	0.003	0.012
Worst Case Black Ink PTE				0.039	0.169
<u>Fluorescent Inks (Interchangable)</u>					
VJ Fluorescent Ink 16-5420QP	143.6	4%	8.51	0.006	0.024
Imaje Fluorescent Ink 9716	143.6	8%	8.92	0.012	0.051
Imaje Additive 8713	143.6	0%	8.34	0	0
Worst case fluorescent PTE				0.012	0.051
<u>Accessory solution for VJ brand</u>					
VJ Make-Up Fluid 16-1060QP	252	0%	8.34	0.000	0.000
<u>Accessory solution for Imaje brand</u>					
Imaje Wash solution 5701	13.5	0%	8.34	0.000	0.000
Total worst-case PTE (16-5000QP black and 9716 fluorescent)				0.050	0.221

Methodology

Capacity = [sum of 2011 ink volume + replenishers (where identifiable)] / 40% (2011 capacity utilization)
VOC PTE (US tons/yr) = (capacity, gal/yr) x (density of ink, lb/gal) x (fraction VOC, %) / (2000 lb/US ton)
VOC PTE (lb/hr) = (capacity, gal/yr) x (density of ink, lb/gal) x (fraction VOC, %) / (8760 hr/yr)

**Appendix A: Emissions Calculations
HAP's From Printing Press Operations**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Nine (9) printing machines using black and fluorescent orange ink for postage cancellation.

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
NA	NA	NA	NA

INK HAPs											
Ink Name	Capacity (gal/yr)	Ethylene glycol (wt %)	Glycol ethers (wt %)	Total HAP (wt %)	Ink Density (lb/gal)	Emissions - ethylene glycol		Emissions - glycol ethers		Total HAP Emissions	
						(lb/hr)	(US ton/yr)	(lb/hr)	(US ton/yr)	(lb/hr)	(US ton/yr)
Black Inks (Interchangable)											
VJ Black Ink 16-5000QP	281.75	10%	8%	18%	8.59	0.028	0.121	0.022	0.097	0.050	0.218
VJ Black Cancellations Ink 20-S2500LP	281.75	0%	0%	0%	8.67	0.000	0.000	0.000	0.000	0.000	0.000
Imaje Black Ink 9702	281.75	0%	0%	0%	8.84	0.000	0.000	0.000	0.000	0.000	0.000
Imaje Additive 8701	281.75	0%	0%	0%	8.34	0.000	0.000	0.000	0.000	0.000	0.000
Kodak Black Ink 1000	281.75	0%	0%	0%	8.49	0.000	0.000	0.000	0.000	0.000	0.000
Kodak Replenisher	281.75	0%	0%	0%	8.34	0.000	0.000	0.000	0.000	0.000	0.000
Worst Case Black Ink (16-5000QP) PTE						0.028	0.121	0.022	0.097	0.050	0.218
Fluorescent Inks (Interchangable)											
VJ Fluorescent Ink 16-5420QP	143.6	0%	3%	3%	8.51	0.000	0.000	0.004	0.018	0.004	0.018
Imaje Fluorescent Ink 9716	143.6	0%	0%	0%	8.92	0.000	0.000	0.000	0.000	0.000	0.000
Imaje Additive 8713	143.6	0%	0%	0%	8.34	0.000	0.000	0.000	0.000	0.000	0.000
Worst case fluorescent PTE (16-5420QP)						0	0	0.004	0.018	0.004	0.018
Accessory solution for VJ brand											
VJ Make-Up Fluid 16-1060QP	252	0%	0%	0%	8.34	0.000	0.000	0.000	0.000	0.000	0.000
Accessory solution for Imaje brand											
Imaje Wash solution 5701	13.5	0%	0%	0%	8.34	0.000	0.000	0.000	0.000	0.000	0.000
Worst case PTE						0.121		0.115		0.236	

Methodology

Capacity = [sum of 2011 ink volume + replenishers (where identifiable)] / 40% (2011 capacity utilization)
HAP PTE (US tons/yr) = (capacity, gal/yr) x (density of ink, lb/gal) x (fraction HAP, %) / (2000 lb/US ton)
HAP PTE (lb/hr) = (capacity, gal/yr) x (density of ink, lb/gal) x (fraction HAP, %) / (8760 hr/yr)

**Appendix A: Emissions Calculations
HAP's From Printing Press Operations**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

source: S.C. Lee, Sanches Lam, Ho Kin Fai
 Characterization of VOCs, ozone, and PM10 emissions from office equipment in an environmental chamber
 Building and Environment 36 (2001) 837–842

Reference reports an average concentration of: 29 ug/m³ for PM₁₀

in a test cell: 1100 mm x 1200 mm x 1800 mm, after printing 60 pages

Equivalent to: 1.15 ug/page (assume US 8.5x11, letter size)

Videojet 37pc postal barcode system operates at 900 ft/min
 (ref: http://www.videojet.com/usa/postal_systems, accessed 7/25/13)

Assume a mail piece is a US #10 envelope 9.5 in long = 0.79 ft
 and postal printing is approximately 6 pieces/letter-size page

Then PTE is:

$$\begin{array}{r}
 900 \text{ ft/min} / 0.79 \text{ ft/pc} \times 1.15 \text{ ug/page} / 6 \text{ pc/pg} = 218 \text{ ug/min} \\
 218 \text{ ug/min} \times 60 \text{ min/hr} \times 2.21\text{E-}05 \text{ lb/ug} = 0.29 \text{ lb PM}_{10}\text{/hr}
 \end{array}$$

**Appendix A: Emission Calculations
Solvent Degreasing**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Permit Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Solvent degreasers including:

Two (2) Bioforce Model BE-15 cold cleaners using Bioforce BE-100 solvent

Location	Manufacturer	Model	Capacity (gal)	Changeout Schedule (months)	Annual Solvent Loss	Solvent (trade name)	Solvent Density (lb/gal)	VOC Content (lb/gal)*	HAP ID	HAP Content (lb/gal)	VOC Emissions (US tons/yr)	HAP Emissions (US tons/yr)
Tool Shop	Bioforce	BE-15	25	24	12.5	AQC Parts Wash	8.59	1.28	none	0	0.008	0
Boiler Room	Bioforce	BE-15	25	24	12.5	AQC Parts Wash	8.59	1.28	none	0	0.008	0
Total											0.016	0

* VOC Content (lb/gal) from MSDS

Methodology

VOC or HAP PTE (US tons/yr) = Annual solvent loss, gal/yr x (density, lb/gal) x (VOC or HAP, %) / (2000 lb/US ton)

Notes:

1. Annual solvent loss assumed 50% of volume

**Appendix A: Emission Calculations
Fugitive Dust**

Company Name: USPS Indianapolis P&DC
Address City IN Zip: 125 W. South St, Indianapolis, IN 46206-9997
Permit Number: R097-33332-00715
Permit Reviewer: Douglas Logan, P.E.
Date: 8/6/2013

Particulate emissions from resuspension of loose material on the paved surface due to vehicle travel on a dry paved road may be estimated from:
 (All references to AP-42, 5th ed.)

$$E = k (sL)^{0.91} W^{1.02} \quad (\text{eqn 1, Ch 13.2.1})$$

Where: E = particulate emission factor
 k = particle size multiplier, g/VKT, g/VMT, or lb/VMT
 sL = road surface silt loading, g/m²
 W = average vehicle weight, US tons

From Table 13.2.1-1
 k = 0.00054 lb/vehicle mile traveled (VMT) for PM_{2.5}
 0.0022 lb/vehicle mile traveled (VMT) for PM₁₀
 0.011 lb/vehicle mile traveled (VMT) for PM₃₀, surrogate for PM

From Table 13.2.1-2
 sL = 0.6 g/m², < 500 average daily traffic (ADT)

W = 80000 lb maximum legal gross weight
 40 US tons

thus E = 0.015 lb/VMT, PM_{2.5}
 0.060 lb/VMT, PM₁₀
 0.298 lb/VMT, PM₃₀

estimating from Google Maps, maximum distance traveled on site is: 0.28 mi

assuming an average of 4 vehicles per hour, 96 vehicles/day

and potential to emit is:

0.39 lb PM _{2.5} /day =	0.07 US tons/yr
1.60 lb PM ₁₀ /day =	0.29 US tons/yr
8.00 lb PM ₃₀ /day =	1.46 US tons/yr



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

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

TO: David Riley
USPS Indianapolis Processing & Distribution Center
125 W South St
Indianapolis, IN 46206

DATE: August 15, 2013

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

SUBJECT: Final Decision
Registration
097 - 33332 - 00715

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:
Jeff Mitchell, Senior Plant Mgr
Sadia Kissoon-Parker Tucker, Young, Jackson, Tull, Inc.
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

Mail Code 61-53

IDEM Staff	LPOGOST 8/15/2013 USPS Processing & Distribution Ctr 097 - 33332 - 00715 /final)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		David Riley USPS Processing & Distribution Ctr 125 W South St Indianapolis IN 46206 (Source CAATS) Via confirmed delivery										
2		Jeff Mitchell Senior Plant Mgr USPS Processing & Distribution Ctr 125 W South St Indianapolis IN 46206 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
7		Sadia Kissoon-Parker Tucker, Young, Jackson, Tull, Inc. 615 Griswold St., Ste. 600 Detroit MI 48226 (Consultant)										
8												
9												
10												
11												
12												
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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--