



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: December 17, 2013
RE: Pratt Visual Solutions / 097 - 33666 - 00548
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 6/13/13



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**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**Pratt Visual Solutions
3035 North Shadeland Avenue
Indianapolis, Indiana 46226**

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

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

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

Operation Permit No.: M097-33666-00548	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2013 Expiration Date: December 17, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary Screen and Digital Printing Operation.

Source Address:	3035 North Shadeland Avenue, Indianapolis, Indiana 46226
General Source Phone Number:	317-524-3216
SIC Code:	2759
County Location:	Marion Outside Center, Perry, and Wayne Townships
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour).
- (b) One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).
- (c) One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).
- (d) One (1) Inca Spyder digital printing press, identified as Inca Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
- (e) One (1) digital printing press, identified as FB6700-1, constructed in 2008, using no controls, with a maximum throughput of 1613.75 (square feet per hour).
- (f) One (1) Inca Onset digital printing press, identified as Onset S20-1, installed in 2009, using no control, with a maximum throughput of 1428 MMin²/year.
- (g) One (1) Patriot single color screen press, identified as Patriot 1, installed in 2009, using no control, with a maximum throughput of 3991 MMin²/year.
- (h) Manual operations, consisting of cleaning and screen preparations for the digital and screen presses.

- (i) One (1) insignificant surface coating booth, identified as B1, constructed in 2009, with a maximum capacity of 50 gallons per month.
- (j) One (1) Vutek GS3200 UV ink printers, identified as GS3200 1-ink, installed in 2010, using no control, with a maximum throughput of 1415 MMin²/year, each.
- (k) One (1) HP Designjet L26500 printer, identified as L26500, using CN705A 1-ink, CN706A 2-ink, CN707A 3-ink, CN708A 4-ink, CN708A 5-ink, CN709A 6-ink and CN710A 7-ink, approved for installation in 2013, using no control, with a maximum throughput of 1577 MMin²/year, each.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M097-33666-00548, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M097-33666-00548 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Pratt Visual Solutions
Address:	3035 North Shadeland Avenue
City:	Indianapolis, Indiana 46226
Phone #:	317-524-3216
MSOP #:	M097-33666-00548

I hereby certify that Pratt Visual Solutions is :

I hereby certify that Pratt Visual Solutions is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of MSOP M097-33666-00548.
- not in compliance with the requirements of MSOP M097-33666-00548.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. (_____)

LOCATION: (CITY AND COUNTY) _____

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

INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:

MEASURES TAKEN TO MINIMIZE
EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL*
SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO
PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO
EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE)

MALFUNCTION REPORTED

BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED

BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)
Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location
--

Source Name:	Pratt Visual Solutions
Source Location:	3035 North Shadeland Avenue, Indianapolis, IN 46226
County:	Marion
SIC Code:	2759 (Commercial Printing, Not Elsewhere Classified)
Operation Permit No.:	M097-33666-00548
Permit Reviewer:	Muhammad D. Khan

On September 17, 2013, the Office of Air Quality (OAQ) received an application from Pratt Visual Solutions related to the transition of a Federally Enforceable State Operating Permit (FESOP) to a Minor Source Operating Permit (MSOP).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP No. F097-26563-00548, issued on January 5, 2009;
- (b) Administrative Amendment No. 097-28156-00548, issued on January 5, 2009;
- (c) Administrative Amendment No. 097-29708-00548, issued on July 24, 2009;
- (d) Administrative Amendment No. 097-32597-00548, issued on November 29, 2010; and
- (e) Administrative Amendment No. 097-32597-00548, issued on January 15, 2013.

Due to this application, the source is transitioning from a FESOP to a MSOP.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Non-attainment effective October 4, 2013, for the Center, Perry, and Wayne Township. The remainder of Marion County is unclassifiable or attainment effective.
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

Pollutant	Designation
	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 PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x 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.
- (c) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutant. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Pratt Visual Solutions on September 17, 2013, relating to transition from FESOP to MSOP. The source has removed Inca Turbo 1 printing press, Inca Turbo 2 printing press, Macdermid printing press, HPXL1500 printing press, Mimaki printing press and two (2) Vutek GS3200 UV ink printers. As a result of this modification the uncontrolled emissions from the entire source are less than Title V Major Source threshold.

The source consists of the following permitted emission unit(s):

- (a) One (1) screen press, consisting of five (5) printing stations, identified as M&R Processor 2, installed in 2005, using no control, and exhausting to stacks SP2-1A&B through SP2-5A&B, respectively, with a combined maximum throughput of 17,500 sfh (square feet per hour).
- (b) One (1) screen printing press, identified as SP-Conquest, installed in 2005, using no control, and

- exhausting to stack M&R-Conquest, with a maximum throughput of 5,276 sfh (square feet per hour).
- (c) One (1) screen printing press, consisting of six (6) printing stations, identified as Thieme, installed in 2005, using no control, and exhausting to stacks Thieme S1 through Thieme S6 respectively, with a combined throughput of 33,177 sfh (square feet per hour).
 - (d) One (1) Inca Spyder digital printing press, identified as Inca Spyder, installed in 2006, using no control, with a maximum throughput of 538.02 sfh (square feet per hour).
 - (e) One (1) digital printing press, identified as FB6700-1, constructed in 2008, using no controls , with a maximum throughput of 1613.75 (square feet per hour).
 - (f) One (1) Inca Onset digital printing press, identified as Onset S20-1, installed in 2009, using no control, with a maximum throughput of 1428 MMin²/year.
 - (g) One (1) Patriot single color screen press, identified as Patriot 1, installed in 2009, using no control, with a maximum throughput of 3991 MMin²/year.
 - (h) Manual operations, consisting of cleaning and screen preparations for the digital and screen presses.
 - (i) One (1) insignificant surface coating booth, identified as B1, constructed in 2009, with a maximum capacity of 50 gallons per month.
 - (j) One (1) Vutek GS3200 UV ink printers, identified as GS3200 1-ink, installed in 2010, using no control, with a maximum throughput of 1415 MMin²/year, each.
 - (k) One (1) HP Designjet L26500 printer, identified as L26500, using CN705A 1-ink, CN706A 2-ink, CN707A 3-ink, CN708A 4-ink, CN708A 5-ink, CN709A 6-ink and CN710A 7-ink, approved for installation in 2013, using no control, with a maximum throughput of 1577 MMin²/year, each.

Unpermitted Emission Units

The source does not consist of any unpermitted emission unit(s).

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

IDEM is aware that there is a pending enforcement action. The source failed to submit a timely FESOP renewal application as required by Condition B.16 of FESOP F097-26563-00548, issued January 5, 2009. IDEM is reviewing this matter and will take the appropriate action.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	8.36
PM10 ⁽¹⁾	2.95
PM2.5	1.28
SO ₂	0
NO _x	0
VOC	30.25
CO	0
GHGs as CO ₂ e	0

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP	7.90 (Ester)
TOTAL HAPs	10.36

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in the permit, since this source uses screen and digital printing presses. All of these presses use plates and not the gravure cylinder to transfer images as defined in subpart QQ. None of the presses at this source are considered publication rotogravure printing presses as defined in 40 CFR 60.431.
- (b) The requirements of the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (60.440 to 60.447) (326 IAC 12), are not included in the permit, because this source does not manufacture pressure sensitive tape and label materials.

- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit, since none of the presses at this source use a gravure cylinder as defined in 40 CFR 60.581, so none of the press operations constitute a rotogravure printing line.
- (d) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included in the permit, since this source has no process which applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) **326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) **326 IAC 2-2 (Prevention of Significant Deterioration(PSD))**
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) **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.

(d) **326 IAC 2-6 (Emission Reporting)**

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

(e) **326 IAC 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 non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(f) **326 IAC 6.5 (Particulate Matter Limitations except Lake County)**

This source is not subject to the requirements of 326 IAC 6.5 because, even though it is located in Marion County, its potential to emit particulate matter is less than ten (10) tons per year, which ensures its actual emissions are less than ten (10) tons per year. This source is not specifically identified in 326 IAC 6.5-6. Therefore, 326 IAC 6.5 do not apply.

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

Printing Presses (Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500)

The printing presses at this source identified as Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500 do not have the potential to emit twenty-five (25) tons per year of VOC, each. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply to any of these printing presses.

Manual Operations

The Manual Operations (Cleaning and Screen Preparations) at this source does not have the potential to emit twenty-five (25) tons per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply to the Manual Operations.

Paint Booth B1

The Paint Booth, identified as B1 does not have the potential to emit twenty-five (25) tons per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply to Paint Booth B1.

Printing Presses (Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500)

- (i) **326 IAC 8-2-5 (Paper Coating Operations)**
The printing presses at this source, identified as Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500, do not conduct web coating or saturation processes of paper, plastic metal foil, pressure sensitive tapes and label. Therefore, the requirements of 326 IAC 8-2-5 are not applicable.
- (j) **326 IAC 8-2-11 (Fabric and Vinyl Coating)**
The printing presses at this source, identified as Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500, do not conduct printing on vinyl coated fabrics, vinyl sheets and coating of a textile substrate with a knife, roll or rotogravure coater. Therefore, the requirements of 326 IAC 8-2-11 do not apply to these printing presses.
- (k) **326 IAC 8-5-5 (Graphic Art Operations)**
The printing presses at this source, identified as Inca Spyder, FB6700-1, Onset S20-1, M & R Processor 2, Thieme, SP-Conquest, Patriot 1, GS3200-1 Ink and HP Designjet L26500, do not perform packaging rotogravure, publication rotogravure, and flexographic printing. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.
- (l) **326 IAC 12 (New Source Performance Standards)**
See Federal Rule Applicability Section of this TSD.
- (m) **326 IAC 20 (Hazardous Air Pollutants)**
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) There is no compliance determination or monitoring requirements applicable to this source.
- (b) There are no testing requirements applicable to this source.

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 September 17, 2013.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 097-33666-00548. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

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

Appendix A: Emissions Calculations
Emissions Summary

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: M097-33666-00548
Pit ID: 097-00548
Reviewer: Muhammad D. Khan
Date: September 20, 2013

Uncontrolled Potential to Emit (tons per year)										
Emissions Unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs	Single HAP	Total HAPs
Inca Spyder	-	-	-	-	-	0.10	-	-	0.10 (Glycol Ethers)	0.10
FB6700-1	-	-	-	-	-	12.44	-	-	-	-
Onset S20-1	-	-	-	-	-	0.54	-	-	0.53 (Glycol Ethers)	0.54
M & R Processor 2	-	-	-	-	-	2.21	-	-	-	-
Thieme	-	-	-	-	-	4.19	-	-	-	-
SP-Conquest	-	-	-	-	-	0.67	-	-	-	-
Patriot 1	-	-	-	-	-	1.44	-	-	1.44 (Glycol Ethers)	1.44
Manual Operations	-	-	-	-	-	8.33	-	-	7.90 (Ester)	8.29
Paint B1	1.09	1.09	1.09	-	-	0.26	-	-	negl.	negl.
GS3200 - 1 Ink	-	-	-	-	-	4.40E-03	-	-	0	0
HP Designjet L26500 - yellow ink	-	-	-	-	-	0.08	-	-	negl.	negl.
Unpaved Roads	7.27	1.85	0.19	-	-	-	-	-	-	-
Total	8.36	2.95	1.28	0	0	30.25	0	0	7.90 (Ester)	10.36

**Appendix A: Emissions Calculations
VOC and HAP Emissions From Digital Printing Press Operations**

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: M097-33666-00548
Pit ID: 097-00548
Reviewer: Muhammad D. Khan
Date: September 20, 2013

Digital Printing Presses

THROUGHPUT				
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Square feet/hour (ft ² /hr)	MMin ² /YEAR
Inca Spyder	1.708	63	538.02	679
FB6700-1	5.123	63	1613.75	2036
Onset S20-1	3.75	63	1181.25	1490

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin ² /Year)	VOC Emissions (TONS/YEAR)	Single HAP (Glycol Ether) Emissions (TONS/YEAR)
Inca Spyder / Sericol ink	14.4	2%	2%	100.00%	679	0.10	0.10
FB6700 / Scitex WB300 ink	30.56	40%	0%	100.00%	2036	12.44	0.00
Onset S20-1	36	2%	2%	100.00%	1490	0.54	0.54

Total VOC Emissions =	13.08 Ton/yr
Total single HAP Emissions =	0.63 Ton/yr
Combined HAP Emission =	0.63 Ton/yr

METHODOLOGY

ft²/hr = square feet per hour

MMin² = million square inches

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Throughput = Maximum line speed feet per minute * Maximum print width inches / 12 (convert inches to feet) * 60 minutes per hour = ft² per hour

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: NON-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))

**Appendix A: Emissions Calculations
VOC and HAP Emissions From Screen Printing Press Operations**

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: M097-33666-00548
Plt ID: 097-00548
Reviewer: Muhammad D. Khan
Date: September 20, 2013

Screen Presses

THROUGHPUT				
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	Square feet/hour (ft ² /hr)	MMin ² /YEAR
M&R Processor 2	29.166	120	17500	22075
Thieme	63.195	105	33177	41851
Patriot 1	12.17	52	3164.2	3991
Conquest	21.105	50	5276	6656

INK VOCS							
Press ID / Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Glycol Ether Weight %	Flash Off %	Throughput (MMin ² /Year)	VOC Emissions (TONS/YEAR)	Glycol Ether Emissions (TONS/YEAR)
M&R Processor 2	20	1%	0%	100.00%	22075	2.21	0.00
Thieme	20	1%	0%	100.00%	41851	4.19	0.00
Patriot 1	36	2%	2%	100.00%	3991	1.44	1.44
Conquest	20	1%	0%	100.00%	6656	0.67	0.00

Total VOC Emissions =	8.50 tons/yr
Total HAP Emissions =	1.44 ton/syr

METHODOLOGY

ft²/hr = square feet per hour

MMin² = million square inches

*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Throughput = Maximum line speed feet per minute * Maximum print width inches / 12 (convert inches to feet) * 60 minutes per hour = ft² per hour

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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%.

Appendix A: Emissions Calculations
VOC and HAP Emissions From Manual Operations (Cleaning & Screen Preparation)

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, Indiana 46226
Permit Number: M097-33666-00548
Plt ID: 097-00548
Reviewer: Muhammad D. Khan
Date: September 20, 2013

	Usage (gallons/year)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	1,2 Epoxy butane wt. %	1,2 Epoxy butane PTE (tons/yr)	Sulfuric Acid wt. %	Sulfuric Acid PTE (tons/yr)	Esters wt. %	Esters PTE (tons/yr)	Total HAP PTE (tons/yr)
Screen Chemicals (Solvents)											
SPIFF CLEANER (ALB1090)	24	9.46	100%	0.11	1%	1.14E-03		0.00		0.00	0.00
STENCIL REMOVER X-TEND 1:55 (XSR-155)	128	10.41	0%	0.00		0.00	6.00%	0.04		0.00	0.04
INK DEGRADENT 520 (XID-520)*	1925	8.4	74%	5.94		0.00		0.00	95.00%	7.68	7.68
RHINO GLUE RHINOMITE 3500 SERIES (RT-RHINOMITE 3500G)	56	7.6	83%	0.18		0.00		0.00		0.00	0.00
CITRA CLEAN (36040)	144	7.04	90%	0.46		0.00		0.00		0.00	0.00
FINISH S2 GAL (SCBS00100PG001)	119	8.13	0%	0.00		0.00		0.00		0.00	0.00
GRAFIC HU42 5 GAL+DIAZO 1 (SCEC50601K5D01)	431	8.13	0%	0.00		0.00		0.00		0.00	0.00
					1-methoxy 2-propanol wt. %	1-methoxy 2- propanol PTE (tons/yr)					
SAATICHEM PW5 PRESS WASH	220	8.12	76%	0.68	10%	0.09		0.00	25.00%	0.22	0.31
GRAFIC HU GAL+DIAZO 1 (SCEC00201KGD01)	46		0%	0.00		0.00		0.00		0.00	0.00
DEFOAMER 405(154S30675/1)	4	8.34	19%	0.00		0.00		0.00		0.00	0.00
XTEND FAST2 HAZE REMOVER (XHR-FAST2/1)	94	9.65	60%	0.27		0.00		0.00		0.00	0.00
				Total VOC		7.64				Total HAP	8.03
	3191										

Methodology

VOC (Tons/Year) = Usage (gallons/year) * density (lbs/gallon) * weight % volatiles * 1 Ton/2000 pounds
HAPs (Tons/Year) = Usage (gallons/year) * density (lbs/gallon) * weight % HAP * 1 Ton/2000 pounds
Usage information supplied by the source

Digital Cleaning (Flushing Solution)	Usage (lbs/day)	Density (lbs/gallon)	VOC wt. %	VOC PTE (tons/yr)	Glycol Ether wt. %	Glycol Ether PTE (tons/yr)	Total HAP PTE (tons/yr)
QV-017 (Inca's)	1.4098	8.04	100%	0.2573	100%	0.2573	0.2573
SolaChrome UV (MacDermid)	0.0123	9.00	100%	0.0022	100%	0.0022	0.0023
	Max Usage (gal/yr)						
Mimaki*	2.0	7.91	50%	0.0040			
HPXL1500*	10.0	7.84	100%	0.0392			
Screen and Digital							
Nazdar SW208 Isoproply Alcohol	2.1534	6.55	99%	0.39			
				Total VOC =		0.69	Total HAPs = 0.26

Methodology

VOC & HAP (Tons/Year) = Usage (lbs/day) * 365 days/year * weight % volatiles * 1 Ton/2000 pounds
Usage information supplied by the source

	VOC (tons/yr)	HAPs (tons/yr)
Total from Manual Operations	8.33	8.29

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

Company Name: Pratt Visual Solutions
 Address City IN Zip: 3035 N Shadeland Ave., Indianapolis, IN 46226
 Permit Number: M097-33666-00548
 Plt ID: 097-00548
 Reviewer: Muhammad D. Khan
 Date: September 20, 2013

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
HP Designjet L26500 - yellow ink ¹	4.1	61	1577

INK VOCS					
Ink Name Press Id	Maxium Coverage ** '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
HP Designjet L26500 - yellow ink1	3.04E-01	40%	80.00%	1577	0.08

Total VOC Emissions =	0.08	tons/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

** Source : HP technical support - specification sheet maximum coverage of 2.11 ml /sq. ft = 3.04 x10e-1 lbs/MMin².

1 - Yellow ink is worst case VOC color for HP Designjet L26500 printer series

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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))

**Attachment A: Emissions Calculations
VOC From Vutek GS3200 Printing Press Operations**

Company Name: Pratt Visual Solutions
 Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, IN 4
 Permit Number: M097-33666-00548
 Plt ID: 097-00548
 Reviewer: Muhammad D. Khan
 Date: September 20, 2013

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
GS3200 - 1 Ink	1.775	126.5	1416

INK VOCS							
Ink Name	Maxium Coverage	Weight % Volatiles*	Weight %	Flash Off %	Throughput	VOC Emissions	Glycol Ethers Emissions
Press Id	'(lbs/MMin ²)		Glycol Ethers		(MMin ² /Year)	(tons/year)	(tons/year)
GS3200 - 1 Ink	14.4	0.04%	0%	100.00%	1514	0.0044	0

Total Emissions =	0.004	0.00
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput
 * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * 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))

Attachment A: Emissions Calculations
VOC From Surface Coating Booth (Paint Booth B1)

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, IN 46226
Permit Number: M097-33666-00548
Reviewer: Muhammad D. Khan
Date: September 20, 2013

Sherwin Williams Super Paint Exterior Latex Satin Paint
Product Number A89T154

Density =	9.34 lbs/gal
Maximam usage =	50 gals/month
VOC content =	0.41 lbs VOC/gal
Volatile Volume =	61%
Volume Non Voaltile =	39%
Solid Content =	3.6 lbs solid/gal
PM Emissions =	1.1 tons PM/year
VOC Emisions =	0.123 tons VOC/year

Porter Paint AQ380 HG Fast Dry Clear Acrylic
Product Code MV380J400

Density =	8.51 lbs/gal
Maximam usage =	50 gals/month
VOC content =	0.88 lbs VOC/gal
Volatile Volume =	60%
Volume Non Voaltile =	40%
Solid Content =	3.4
PM Emissions =	1.0 tons PM/year
VOC Emisions =	0.264 tons/year
Worst Case VOC Emissions =	0.264 tons/year
Worst Case PM Emissions =	1.1 tons/year

Note:

PM=PM10=PM2.5

For Porter Paint volatile volume is assumed to be 60%.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Pratt Visual Solutions
Address City IN Zip: 3035 North Shadeland Avenue, Indianapolis, IN 46226
Permit Number: M097-33666-00548
Plt ID: 097-00548
Reviewer: Muhammad D. Khan
Date: 20-Sep-13

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Tractor Trailer (entering plant) (one-way trip)	1.0	20.0	20.0	20.0	400.0	1320	0.250	5.0	1825.0
Tractor Trailer (leaving plant) (one-way trip)	1.0	20.0	20.0	20.0	400.0	1320	0.250	5.0	1825.0
Totals			40.0		800.0			10.0	3650.0

Average Vehicle Weight Per Trip = 20.0 tons/trip
 Average Miles Per Trip = 0.25 miles/trip

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	20.0	20.0	20.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.06	1.54	0.15	lb/mile
Mitigated Emission Factor, Eext =	3.98	1.02	0.10	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Tractor Trailer (entering plant) (one-way trip)	5.53	1.41	0.14	3.64	0.93	0.093
Tractor Trailer (leaving plant) (one-way trip)	5.53	1.41	0.14	3.64	0.93	0.093
Totals	11.06	2.82	0.28	7.27	1.85	0.19

Methodology

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
- Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
- Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit



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: Scott Bergfield
Pratt Visual Solutions
3035 N Shadeland Ave
Indianapolis, IN 46226

DATE: December 17, 2013

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

SUBJECT: Final Decision
MSOP - Transition from FESOP
097 - 33666 - 00548

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:
Teddir Linder, Dir - Ops
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

December 17, 2013

TO: Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN

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

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

Applicant Name: Pratt Visual Solutions
Permit Number: 097 - 33666 - 00548

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 12/17/2013 Pratt Visual Solutions 097 - 33666 - 00548 /final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Scott Bergfield Pratt Visual Solutions 3035 N Shadeland Ave Indianapolis IN 46226 (Source CAATS) Via confirmed delivery										
2		Teddir Linder Dir - Ops Pratt Visual Solutions 3035 N Shadeland Ave Indianapolis IN 46226 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 (Library)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
7		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)										
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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